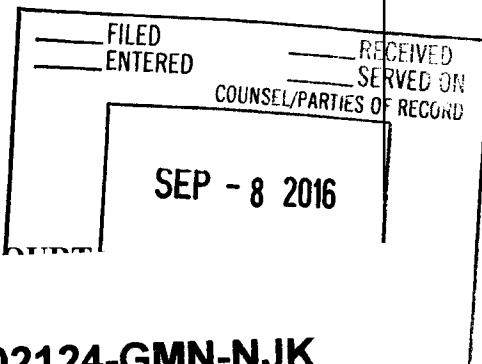


Anshu Bharat Pathak  
 5615 Cameron St, Suite 7  
 Las Vegas, NV 89118  
 E-Mail: anshupathak@aol.com



IN THE UNITED STATES DISTRICT COURT

DISTRICT OF

**2:16-cv-02124-GMN-NJK**

ANSHU PATHAK, AN INDIVIDUAL;

PLAINTIFF

V.

YAHOO!, INC.;  
 MICROSOFT INC.;  
 AOL INC.;  
 AND DOES 1 THROUGH 10, INCLUSIVE

DEFENDANTS.

CIVIL COMPLAINT FOR:

1. Unjust Enrichment;
2. Demand for Accounting;
3. Constructive Trust and
4. Permanent Injunction
5. Trademark Infringement 15 U.S.C. § 1114 (1);
6. "Passing Off" Under the Lanham Act -15 U.S.C. § 1125 (a);
7. Trademark Dilution - 15 U.S.C. § 1125 (c);
8. Cybersquatting -15 U.S.C. § 1125 (d);

[DEMAND FOR JURY TRIAL]

Plaintiff Anshu Bharat Pathak (referred to alternatively as "Plaintiff" hereinafter) hereby complains and alleges as follows.

1. Plaintiff proudly owns the registered Trademark "**EXOTIC MEAT MARKET**" in International Class 035 for on-line retail gift shops; on-line retail store services featuring exotic meats, hotdogs, sausages, salamis; on-line wholesale store services featuring exotic meats, hotdogs, sausages, salamis; operating an on-line shopping site in the field of exotic meats, hotdogs, sausages, salamis; Retail and on-line grocery store services featuring home delivery service. [Exhibit 1]
2. Plaintiff proudly owns the registered Trademark "**EXOTIC HOT DOG OF THE MONTH CLUB**" in International Class 035 for computerized on-line retail store

services in the field of monthly exotic hot dog's shipments to club members. Trademark Registration Number 4453666. [Exhibit 2]

3. This complaint is brought to address the willful violation of Plaintiff's trademark rights in the phrase "**EXOTIC MEAT MARKET**" Trademark Registration Number 4469007 by direct competitor Lobel's of New York, LLC.[Exhibit 1]
4. This complaint is brought to address the willful violation of Plaintiff's trademark rights in the phrase "**EXOTIC MEAT MARKET**" Trademark Registration Number 4469007 by YAHOO!, INC.[Exhibit 1]
5. This complaint is brought to address the willful violation of Plaintiff's trademark rights in the phrase "**EXOTIC HOT DOG OF THE MONTH CLUB**" Trademark Registration Number 4453666 by YAHOO!, INC.[Exhibit 2]
6. Plaintiff has continuously used "**EXOTIC MEAT MARKET**" and "**EXOTIC HOT DOG OF THE MONTH CLUB**" marks in commerce and acquired distinctiveness.

#### **THE PARTIES**

7. Plaintiff Anshu Pathak is an individual resident of State of Nevada.
8. Plaintiff is informed and believes, and based thereon alleges, that Yahoo!, Inc. (hereinafter the "**YAHOO**"), operates as a digital media company that is focused on informing, connecting, and entertaining users through research, communications, and digital content products with a revenue of \$4.8 Billion from advertisements and "Pay Per Clicks" on their search engine.
9. Plaintiff is informed and believes, and based thereon alleges, that MICROSOFT, Inc. (hereinafter the "**MICROSOFT**"), operates as a digital media company that is focused on informing, connecting, and entertaining users through research, communications, and digital content products with a revenue of \$16.8 Billion from advertisements and "Pay Per Clicks" on their search engine.
10. Plaintiff is informed and believes, and based thereon alleges, that AOL INC. (hereinafter the "**AOL**"), operates as a digital media company that is focused on informing, connecting, and entertaining users through research, communications, and digital content products with a revenue of \$190 Million from advertisements and "Pay Per Clicks" on their search engine.

11. Plaintiff is informed and believes, and based thereon alleges, that above named Defendants and DOES 1 through 10, inclusive, are in some manner responsible for the wrongs alleged herein, and that at all times referenced each was the agent and servant of the other Defendants, whom obtained financial benefit from the Defendant's acts and omissions, and each was acting within the course and scope of said agency and employment.
12. Plaintiff is informed and believes, and based thereon alleges, that above named Defendants and DOES 1 through 10, inclusive, did aid, abet, participate in, contribute to, or benefit from the acts and behavior alleged herein and the damages caused thereby, and by their inaction ratified and encouraged such acts and behavior.
13. Plaintiff further alleges that above named Defendants and DOES 1 through 10, inclusive, had a non-delegable duty to prevent or cure such acts and the behavior described herein, which duty Defendant and DOES 1 through 10, inclusive failed and/or refused to perform.

#### **JURISDICTION AND VENUE**

14. This action arises under the Lanham Act, 15 U.S.C. § 1114 and §1125. This court has federal question jurisdiction over this action pursuant to 15 U.S.C. § 1121(a), 28 U.S.C. § 1331, and 28 U.S.C. § 1338 (a) and (b). This court has supplemental jurisdiction over Plaintiff's State Law Claims pursuant to 28 U.S.C. § 1367(a).
15. Alternatively, this court has diversity jurisdiction pursuant to 28 U.S.C. § 1332. The controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States;
16. Venue is proper in this district under 28 U.S.C. § 1391 (b) and 28 U.S.C. § 1400(a)

#### **CEASE AND DESIST NOTICE SENT TO DEFENDANTS**

17. Plaintiff sent "Notice of Cease and Desist" to Defendants, their associates and their partners.
18. Defendants continued to add Plaintiff's Trademarks as "Key Words" in the "bidding list" of their advertisers at expense of Plaintiff. [ Exhibit 1 and 2]

#### **HISTORY OF "EXOTIC MEAT MARKET"**

- 1 19. It is undisputed fact that Plaintiff Anshu Pathak is **one and only individual** on this world  
2 who offers more than **eighty-six (86) different species** of “Legal Exotic Meats” from  
3 **Alligator Meat to Zebra Meat** to his customers all over the world.
- 4 20. It is undisputed fact that Plaintiff Anshu Pathak is **one and only individual** on this world  
5 who offers fifteen (15) different “Exotic Hot Dogs” made from **Alligator Meat to Zebra**  
6 **Meat** to his customers all over the world.
- 7 21. Plaintiff Anshu Pathak respect and follows the beliefs of Indigenous American Indians  
8 that animals should only be "Harvested for Food" and not for “Sports” or for “Skin”.
- 9 22. As custodians of Mother Nature, Plaintiff Anshu Pathak recognizes responsibility to the  
10 environment.
- 11 23. Every step of the way, from paddock to plate, Plaintiff Anshu Pathak’s priority is to  
12 continuously improve welfare of animals and birds raised for food, environmental  
13 management and protect endangered species.
- 14 24. Plaintiff Anshu Pathak has been featured on all major TV Channels and News Papers of  
15 United States and outside United States for his world’s most controversial “Exotic Meat  
16 Market”.
- 17 25. Plaintiff Anshu Pathak has been providing “Exotic Meats” to all Food related TV  
18 Channels in USA and outside USA for their cooking shows from his “Exotic Meat  
19 Market”.
- 20 26. In 2011, Press Enterprise featured Anshu Pathak and his “Exotic Meat Market” on front  
21 page of their News Paper in California. Video can be viewed at  
22 <https://www.youtube.com/watch?v=GFESA0knAQ>.
- 23 27. An uneducated group of people without understanding of “**Endangered Species**” lost  
24 their petition filed with White House [US Govt.] to close down Plaintiff Anshu Pathak’s  
25 “**Exotic Meat Market**” on August 30, 2015. In fact, only 716 [.07%] people signed the  
petition which required 100,000 signatures.
28. Over 1.4 Million people from all over the world has viewed and admired Plaintiff Anshu  
Pathak’s way of raising exotic animals and exotic birds for food. Video can be viewed at  
<https://www.youtube.com/watch?v=xltpc8dmc0c>.
29. Over 1000,000 people from all over the world visit Plaintiff Anshu Pathak’s “Exotic  
Meat Market” every year.



- 1 30. California Sunday Magazine published article about Plaintiff Anshu Pathak and his  
2 "Exotic Meat Market" which can be read at [https://stories.californiasunday.com/2015-05-](https://stories.californiasunday.com/2015-05-03/anshu-pathak-exotic-meat-guy/)  
3 03/anshu-pathak-exotic-meat-guy/
- 4 31. LAist published an article about Plaintiff Anshu Pathak and his "Exotic Meat Market",  
5 which can be read at  
6 "http://laist.com/2015/01/08/anshu\_pathak\_lion\_meat\_exotic\_meat\_riverside.php#photo-  
7 12"
- 8 32. Even Playboy Magazine visited Plaintiff Anshu Pathak and his "Exotic Meat Market"  
9 which can be viewed at, "https://www.youtube.com/watch?v=HYQi-kJT5Ow"
- 10 33. Plaintiff has continuously used "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG  
11 OF THE MONTH CLUB" marks in commerce since as early as 1999 and acquired  
12 distinctiveness.
- 13 34. After filing the application for Trademark for the word, "Exotic Meat Market" in  
14 "Standard Characters" Plaintiff sent electronic email to all his major competitors and  
15 their Trademark counsels to oppose his Trademark Applications.
- 16 35. Plaintiff has established his good reputation all over the world as "**ETHICAL**  
17 **FARMER**" for his "Exotic Meat Market" and "Exotic Hot Dog of the Month Club."
- 18 36. Following comments [Few from Vegetarians too] can be reviewed about Plaintiff Anshu  
19 Pathak at <https://www.youtube.com/watch?v=xltpc8dmc0c>.
  - 20 1) This is cool, I want to go try some of that farm's products! it looks amazing!
  - 21 2) This guy gives hope in humanity.
  - 22 3) Holy shit this guy is heartwarming.
  - 23 4) Hard working man, this Anshu guy is.
  - 24 5) Anshu seems like such a nice person, and he treats his animals with so much  
25 respect. It made me smile when he patted people on the back, said "thank you"  
and smiled so much :) I chose to stop eating meat when I saw how factory farms  
treated animals. I'd go back to eating it again if I knew all farms treated their  
animals like he does, or if I lived near him!
  - 6) He is so precious and seemed so happy, I love him already and his presence  
would be able to make anyone happy! Such a bright man, despite the way he lives  
but he loves it. I admire that.

- 1 7) I don't comment on videos that often, and I hardly ever give a video a "like", but  
2 this video just made me so happy. he seems like such a wonderful, hardworking  
3 man. he's just so grateful and humble, which is not something you see much of  
4 these days. you did well on this one, buzz feed. you get a thumbs up today.
- 5 8) Oh my goodness he seems to be such a good and precious man! I love seeing  
6 people with such happy souls.
- 7 9) Shout out to Anshu for being one of the rare farmers who actually cares for the  
8 animals wellbeing. more farmers need to be like you.
- 9 10) What a hardworking guy. This made me so happy. This is how raising animals  
10 should be.
- 11 11) The farmer is so nice it's unreal I never wanted to hug someone more.
- 12 12) Anshu is a really cool dude.
- 13 13) It's so enlightening to know that there are good farmers like Anshu out there,  
14 making sure his animals are treated humanely.
- 15 14) THIS is how animals that are used for food should live their lives. They should be  
16 treated with care and respect before their slaughter.
- 17 15) I'm a vegetarian and this made me very happy, I believe this is how all meat  
18 should be raised.
- 19 16) I really liked Anshu!! He seemed genuine and funny.
- 20 17) That farmer seems so nice.
- 21 18) I love farmers like this man. People like him are real farmers. Those animals  
22 deserve to be happy so that later they bring happiness around the dinner table. :)
- 23 19) This is the way that kill animals should be raised; in an open environment, cared  
24 for, well-fed, and killed as humanly and painless as possible!
- 25 20) I'm vegetarian and I think that if you're going to eat meat I would much rather  
them be treated like this definitely.
- 21) Appreciated his pride in his craft and how nice he was! This is how animals  
should be raised. I would love to sit down and have a meal with him.
- 22) This guy is awesome, and all I saw were his animals and listened to his honest  
words.
- 23) Anshu seems like a good person we need more of him.

1 24) This farmer is adorable and so sweet.

2 25) Wish all meat was raised like this.

3 26) Anshu reminds me of my grandfather, who's also a farmer, who raises goats,  
4 cows, chickens, turkeys, ducks, pigs, and fishes. They're dedication to raise these  
5 animals very well, is really inspiring. It's not easy and it will take a lot of your  
6 time. Hands down to all the farmers out there.

7 27) The farmer seems like such a sweetheart.

8 28) I just want to give Anshu a hug.

9 29) Anshu is an awesome person, raising the animals a good life is success to me. I'm  
10 not vegetarian, I love meat and eat it. Cx I would feel less guilty if all animals  
11 were raised like that, because I can know that they were happy.

12 30) This video makes me very happy. My family raises and eats our own wild and  
13 exotic game meats. They are all organic, healthy and delicious. More people need  
14 to be open to so called "alternative" meats. In other countries, these protein  
15 sources are a daily meal and no one thinks twice about it.

16 31) Is it weird that I love Anshu's voice?

17 32) This is the kind of meat I would eat, guilt free! It's the way all meat should be  
18 consumed. Clean, lots of space, hopefully killed humanely and quickly, well fed.  
19 But if I had gone to that ranch and seen the animals, I wouldn't have dared eat  
20 meat that day.

21 33) We need more farmer like this one, he loves his animals and take good care of  
22 them instead of having them tortured in tiny cages on concrete.

23 34) I'm a vegetarian and it's good to see that these animals are raised properly and not  
24 in harsh horrible conditions.

25 35) I wish more animals were treated like this, like it's not that hard to kill an animal  
without abusing it

36) I'm a vegetarian, but I really respect him. He clearly cares for the animals well.

37) I feel like this is how a lot of people like to think their meat is raised and farmed,  
but the reality is there are almost no farms like this anymore!! Kudos to this guy  
for continuing to run an honest business.

38) Love this video the farmer was super nice!

1 39) I wish he was my dad 😊.

2 40) This guy deserves all the awards.

3 41) This is how everything should be raised. This is nice. I like this.

4 42) Respects to this guy. He has his farming done right.

5 43) I am not vegan but am staunchly against factory farming so it's great to see people  
6 showing the healthy more ethical side of farm raised animals.

7 44) What a beautiful farm. this man obviously cares about the health and wellbeing of  
8 his animals. he even names some of them. it's possible to eat meat while having  
9 respect for the life it took to feed you.

10 45) What an interesting man, I see a lot of positive comments from vegans that are  
11 saying if you are going to eat meat buy it from farmers like this gentleman.

12 46) He seems amazing tbh, so much care for what he does.

13 47) I wish all farms were like this. Eating meat isn't a problem how the animals are  
14 treated is the problem.

15 48) He seems like a really nice humble man.

16 49) This man is great he knows how raise animals for meat. I don't eat meat but this  
17 man makes me happy his animals have lived happy and healthy lives.

18 50) Every farm should be like this.

19 51) My favorite buzz feed video yet! I feel that people forget where their food comes  
20 from, and don't have respect for it. I wish that the reason were more farmers like  
21 him.

22 52) I really like that guy, he seems like a very calm chill dude ^^

23 53) You can tell that guys proud of his farm, so he should be! Looks beautiful there.

24 54) That man with the smile and the milk dripping from his face, not feeling the need  
25 to wipe himself... that's pure man.

55) This is how farming should be done.

56) I like this guy that's how I raise my animals they are raised for food but I love  
them and care for them while they are here 😊 MORE POSITIVE MEAT  
FLAVORS TO!!!!!! 😊 😊 😊.

57) I wish I could meet this man Anshu. He looks like the most humble, interesting  
guy I've seen recently. His life must be peaceful.

1 58) This is one of the coolest things I have ever seen ever. That man is so humble and  
2 kind. I love the way he feels about his animals and line of work. I am hugely  
3 against industrial farming, herding, and slaughtering so to see this was extremely  
4 refreshing and beautiful.

5 59) This man will always be blessed, amazing.

6 60) This is how should animals ne raised to be food not like in the factories.....

7 61) Indians (mostly the elder ones) are one of the most humble and friendly people  
8 that I have ever met.

9 62) What a nice guy.

10 63) I wish all animals were raised like this. They deserve it. and I love this guy lol.

11 64) I want to be Anshu.

12 65) I honestly just want to live on that farm with that guy and help him out because it  
13 honestly looks fun.

14 66) Aweee this farmer is just the cutest, so damn friendly.

15 67) It's nice that he treats his animals kindly, and gives them love. That's how all  
16 animals used for food should be treated. They should die happy, not in some  
17 crowded cage in its own feces.

18 68) I'm a vegetarian but I love this. I love the way he cares for the animals and loves  
19 them. I mean everybody says "they're just gonna die anyways, it doesn't matter  
20 how they're raised" but I mean, we all are gonna die but we all try to make it as  
21 fulfilling as ever. so I really appreciate how this guy farms, because everything  
22 else is all factories.

23 69) This dude was so chill & I love it.

24 70) All animal used for food should be raised like this.

25 71) I love this guy.

72) I'm a vegetarian but it's good to know that he treats his animals nicely.

73) I think I've seen Anshu on like 4 other channels hahahah love that guy.

74) Anshu's the man.

75) As a vet student, this farm makes me incredibly happy. The man understands that  
an animal's stress will produce a less quality carcass, and has given them the  
perfect life up until slaughter. I am sure he tries to avoid stress in slaughter as

1 well. And much of the world eats goats, I haven't tried it myself but I hear it's  
2 amazing.

3 76) Anshu appears to be a really cool, friendly, guy.

4 77) I wouldn't be a vegetarian if all animals were treated like this. It's lovely.

5 78) This is how animals should be raised.

6 79) I love this guy! He was so humble and happy to see them all enjoying his food!

7 80) I am vegan, I would obviously never eat the meat, but I support the fact that if  
8 someone HAS to eat meat, this is probably the best way.

9 81) This is how everything should be raised. This is nice. I like this.

10 82) Oh my goodness I love this.

11 83) This is how we should raise all the animals we use for food. We treat our animals  
12 like a factory, just a product to be made and sold. We forget that animals are  
13 living creatures too. They should be treated well, like this man treats his animals.  
14 A+ for him.

15 84) The Farmer is nice. I want to meet him.

16 85) Anshu seems like such a cool guy.

17 86) I think somehow we could say this an educational video.. cool vid.

18 87) I love the way this man respects his animals. This is how farm animals should be  
19 treated...loved and respected for the sacrifice they make in order for us to eat.

20 88) I'd love to see this become the standard method of meat production in my  
21 lifetime. not likely, but one can hope.

22 89) That farmer is hella cool yo!

23 90) Man that farm owner is so cool.

24 91) I bet If more farmers raised their stock like this man, we'd have a lot less vegans  
25 around. Give 'em a good life and a quick death so they can go on to be  
nourishment for something else. Circle of life my friends.

92) I like how he says 'enough water for everybody' in reference to his animals :) like  
his friends.

93) THIS is what farming should look like in America. There should be no factories,  
no small cages, no animal cruelty.

1 94) What a nice man, came to the states legally, built himself a great life, and respects  
2 the American way of life. Why do so many people agree with letting people who  
3 illegally snuck into our country stay, provide them with welfare, and conform to  
4 their culture?

5 95) This guy is fantastic.

6 96) I may be wrong on this, but is this the same guy as skippy62able's "What Happens  
7 When A Human Tries to Steal Eggs From An Ostrich Nest" video? He seems  
8 really familiar, if it is he's a pretty cool guy.

9 97) I'm not vegan but I like the way he treats his animals.

10 98) I like this. He raises the animals for meat, but he treats them like family. He  
11 knows he's gonna kill the animals one day, but he keeps them healthly, well  
12 raised, and raised like family. It's sad to know that some people raise animals like  
13 trash. Anshu is a great a kind guy. I like him.

14 99) This farm looks after there animals well. They look so happy and healthy! What a  
15 good life they would have had!

16 100) I kinda have an old man crush on the farmer.

17 101) I love Anshu!

18 102) This guy is doing what he does, the best way it can be done. As an animal  
19 lover, I wish all meat farmers were like him. Props to you, Anshu, you're great.

20 103) There's a lot of people commenting upset that it wasn't shown how the  
21 animals were slaughtered and "how can you nicely kill an animal?" has any one of  
22 these people realized animals in nature are absolutely brutal to the animals they  
23 kill? they rip each other to shreds and leave the bodies to rot in the woods. there is  
24 no "nice way" to kill an animal, but that doesn't mean we should halt doing so  
25 entirely - i think it should just be quick an efficient. meat is a way for us to get  
protein and nutrition. i love this farmer and how he treats his animals, and would  
like to see more farms like his, but i personally think it's fruitless to be upset about  
deaths of animals we eat.

104) Isn't it ironic how he's Indian but he has a meat farm.

105) I'm a vegetarian, but it makes me glad to see animals raised in these conditions. If you are going to consume meat, remember animals deserve dignity and looking for well-kept meat like this is the best option for you and the world.

106) I would definitely buy meat from this man knowing that the animals have lived a good life. Also he looks like a really nice person.

107) I wanna be like him :(

108) This is how all animals should be raised before they are eaten.

109) I'm glad animals are raised this way at that guys farm, not kept in tiny spaces and being slaughtered in inhumane ways.

110) THIS is how you raise an animal. With respect and love. You care for it. Because unlike plants, animals are more than food. Anshu is just an incredible person for doing this, and i have to say, there are so many edible animals in this world that we are not consuming...wild meat is the best!

111) This guy is a great guy! He's even on L.A. beast's ostrich video where he chases away ostriches.

112) I really love this farmer. Beautiful heart in the way he raises his animals.

113) Watching this made me happy.

114) Anshu seems like a really nice guy to be around.

115) I'm a vegan and yet I see this as okay...I really wish all meat raised animals were raised like this instead of being crammed in a tight space, with little food, and abuse. This is the humane way to raise animals for slaughter. I'm proud if this guy!

116) He seems like such a genuinely nice person :-)

117) This is the way animals that we kill for food should be raised. Show them with love. Good man. Great farmer.

118) I like his philosophy.

119) Farmer was super nice. But in reality to feed everyone in America who wants meat requires some of those animal factories. I don't like it, but most Americans cannot afford free-range organic meat.

120) Props to Buzzfeed for finding awesome people like Anshu and give him a spotlight.



121) The farmer was so sweet :)

122) Good to see nice responsible farming. how it should be.

123) Wow, those animals are loved & well taken care of. Beautiful farm.

124) His so nice. Most farmers are only raising animals for meat and money.

They basically hit and abuse the animals to get it to do whatever he/she wants it to do. But Anshu is a really nice guy. And treats the animals like it should be treated.  
:)

125) I actually want a friend like Anshu.

126) Anshu is legit goals 🥰🥰.

127) I'm vegan and against eating meat but if all animals that we eat were raised like this man raises his animals everything that we eat would most likely taste better, and the animals would live a happy life so I still highly respect this man and his care for the animals although I am vegan.

128) I wish more farms were like his.

129) If I ever had to eat meat or animal product I would want it to be raised like this. :)

130) We owe it to give the animals we eat the best life possible.

131) This farmer is so well respected for how he feeds, treats, houses, and loves his animals. He ensures that they live a good, healthy, and happy life before we use them to keep humans and other animals fed.

132) I don't eat meat, but I wanna meet this guy just to have a conversation. He probably has a ton of cool stories.

133) Aw he seems like a sweet farmer.

134) Modern day food industry can learn something about this. Governments have to do something about them.

135) I think this is how farming should be.

136) I hope to own a farm like his one day.

137) That's how animals should be raised. Great great guy and a huge thank you. Support your local farms, everyone. Know where your meat is coming from.

138) He is a really cool guy.

139) I LOVE THIS!

140) Anshu is cool.

141) Good to know they're treated nicely before they're slaughtered for human consumption.

142) This is how all farm animals should be raised.

143) All meat should be raised like this.

144) If you do eat meat, it should be raised like this. The problem is that most meat is NOT raised like this which is probably one of the top reasons why I'm going vegan once I hit college. For example, the four biggest meat corporations control over 80% of all the beef slaughtered. And I think we all know how different factory farms are from Anshu's farm.

145) "The way I raised them is...the way they should be raised."

146) I'm glad that he takes good care of the animals.

147) I want to marry Anshu he is so nice omg.

148) I love Anshu man:')

149) Factory farms could learn a thing or two from Anshu.

150) I loved this.

151) Man..I would straight up live with that guy just for the food!

152) He seems like such a genuinely sweet man! He cares about what he does, and he cares about the animals just as much! It was beautiful to see such passion and friendliness.

153) This is how all farming should be.

# **UNJUST ENRICHMENT SCHEME OF YAHOO AND MICROSOFT CASE # 1**

37. Defendant YAHOO and MICROSOFT sells Plaintiff's Trademarks as "Key Words" to their advertisers without Plaintiff's knowledge.

38. Defendant YAHOO and MICROSOFT sells Plaintiff's Trademarks as "Key Words" to their advertisers without Plaintiff's written permission.

39. Plaintiff sent "CEASE AND DESIST" notice to ELKUSA ([WWW.ELKUSA.COM](http://WWW.ELKUSA.COM)) for Trademark Infringement.

40. Plaintiff received following e-mail from a competitor/advertiser on May 29, 2016.

**From: Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>**

**To: anshupathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>**

1 Sent: Sun, May 29, 2016 4:21 pm  
2 Subject: Possible Trademark infringement

3 Anshu Pathak  
4 5615 S. Cameron St; Unit 7  
5 Las Vegas, NV 89118  
6 Email: [anshupathak@aol.com](mailto:anshupathak@aol.com)  
7 May 29, 2016

8 I am in receipt of your assertion of trademark infringement regarding federal trademarks  
9 for Exotic Meat Market. I have reviewed your two current live trademarks for Exotic  
10 Meat Market and find them to be in order.

11 After a brief search of my current keyword programs, I can find no advertising, nor  
12 solicitations for the term "Exotic Meat Market" in any of my current keyword  
13 programs. Please cite specific examples of the possible infringement.

14 In good faith, since I too am a trademark holder and pending a fair resolution of this issue,  
15 I have suspended a portion of my keyword program to limit any possible infringement.

16 However, as we continue to review our legal and advertising status, we will need to know  
17 some of the specific examples for which you are claiming infringement.

18 Thank you for your attention.

19 Rich Forrest  
20 Mountain Velvet Ltd.  
21 DBA Grande Natural Meats

22 41. Plaintiff received following e-mail from a competitor/advertiser on May 30, 2016.

23 From: Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>  
24 Date: 5/30/16 9:46 AM (GMT-08:00)  
25 To: Anshu Pathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>  
Subject: Re: Possible Trademark infringement

Greetings Anshu:

Thank you for the screen shots. It would seem Yahoo (aka Bing) is creating this problem. Exotic Meat Market WAS NOT one of my keywords for my rabbit advertising, yet the search engine decided that somehow my ad was suitable for that kind of search.

As such, I will apologize for Yahoo's mistakes in their aggressiveness to sell ad space.

In an effort to fix the problem, I have added a negative keyword phrase "Exotic Meat Market" to all Yahoo (Bing) keyword campaigns.

1 Please let me know if any other searches result in unintentional infringement of Exotic  
2 Meat Market.

3 Thank you for your patience.

4 Rich  
5 Grande Meats

6 42. Plaintiff received following e-mail from a competitor on May 31, 2016.

7 From: Rich <antler333@gmail.com>  
8 To: Anshu Pathak <anshupathak@aol.com>  
9 Sent: Tue, May 31, 2016 7:48 am  
10 Subject: Re: Trademark infringement - ElkUSA  
11 Anshu:

12 Thank you for your attention in solving this problem. All my current ad programs have  
13 been covered by negative key words.

14 Please know that no intentional infringement occurred, but the pay per click search  
15 mechanisms seem to get too aggressive sometimes. As such, should you find another  
16 possible infringement on Exotic Meat Market, just let me know and I can figure out a block  
17 on that particular search engine when it goes beyond my actual keywords.

18 I noticed that today grassfedtraditions replaced me and yesterday it was buffalogal. Seems  
19 that the Bing PPC (Yahoo and MSN) likes to "fluff up" its advertiser listings. Perhaps  
20 they need a letter.

21 rich  
22 grande meats.

23 On Tue, May 31, 2016 at 7:14 AM, <anshupathak@aol.com> wrote:

24 Good Morning Rich,

25 Thank you.

Have you checked your invoices from last three years for your key words? That will help  
you to understand the infringement of my Trademark.

At this point, I will not file a civil action against your business. But in future, if I will notice  
further infringement, I will be forced to file the civil action to protect my Trademark  
rights.

You have been a Gentleman.

Best

Anshu Pathak

-----Original Message-----

From: Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>

To: anshupathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>

Sent: Tue, May 31, 2016 5:19 am

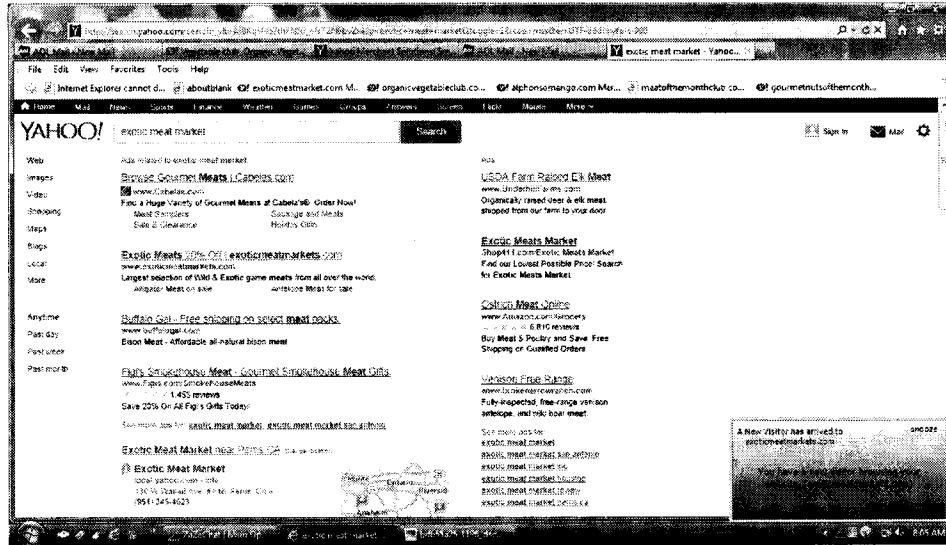
Subject: Re: Possible Trademark infringement

I have added the negative key word "Exotic Meat Market" to all my pay per click advertising programs. That should cure any more problems.

Rich  
grande meats

**UNJUST ENRICHMENT SCHEME OF YAHOO AND MICROSOFT CASE # 2**

43. The world is spending more than \$ 4.8 billion a year on pay-per-click advertising through YAHOO and \$16.8 Billion MICROSOFT alone. YAHOO'S keyword advertising, allows advertisers to purchase or bid on certain keywords. When a user searches for these words, links to the advertisers' websites appear in a "Sponsored Links" section of the search results. In addition, advertisements with keywords can appear throughout the YAHOO network – including on YAHOO Maps, YAHOO Product Search and YAHOO Groups websites along with websites of affiliated entities. When the keywords at issue are comprised of generic terms, there are few objections. But when the keywords include trademarks, intellectual property owners understandably believe the goodwill associated with their marks is being improperly utilized to direct traffic to third party websites. Examples of these objection-raising third-party websites could include competitor websites, unauthorized retailers, sites offering counterfeit goods or services, or sites designed to appear as neutral information sources that are actually backed by a competing company.
44. Defendant YAHOO and MICROSOFT "adds" Plaintiff's Trademarks as "Key Words" to their advertisers "bidding list" at Plaintiff's expense. (loss of Plaintiff's business)
45. Defendant YAHOO and MICROSOFT "adds" Plaintiff's Trademarks as "Key Words" to their advertisers "bidding list" without Plaintiff's written permission.
46. Plaintiff sent "CEASE AND DESIST" notice to BROKEN ARROW RANCH ([WWW.BROKENARROWRANCH.COM](http://WWW.BROKENARROWRANCH.COM)) for Trademark Infringement based on following screen shot dated December 15, 2013.



47. The owner of BROKEN ARROW RANCH ([WWW.BROKENARROWRANCH.COM](http://WWW.BROKENARROWRANCH.COM))

confirmed by electronic mail that he did not add Key Word, “EXOTIC MEAT MARKET.”

48. Defendant YAHOO and MICROSOFT were adding Plaintiff’s Key Word “EXOTIC MEAT MARKET” on “BIDDING LIST” of advertisers and stealing intellectual property of Plaintiff without his knowledge.

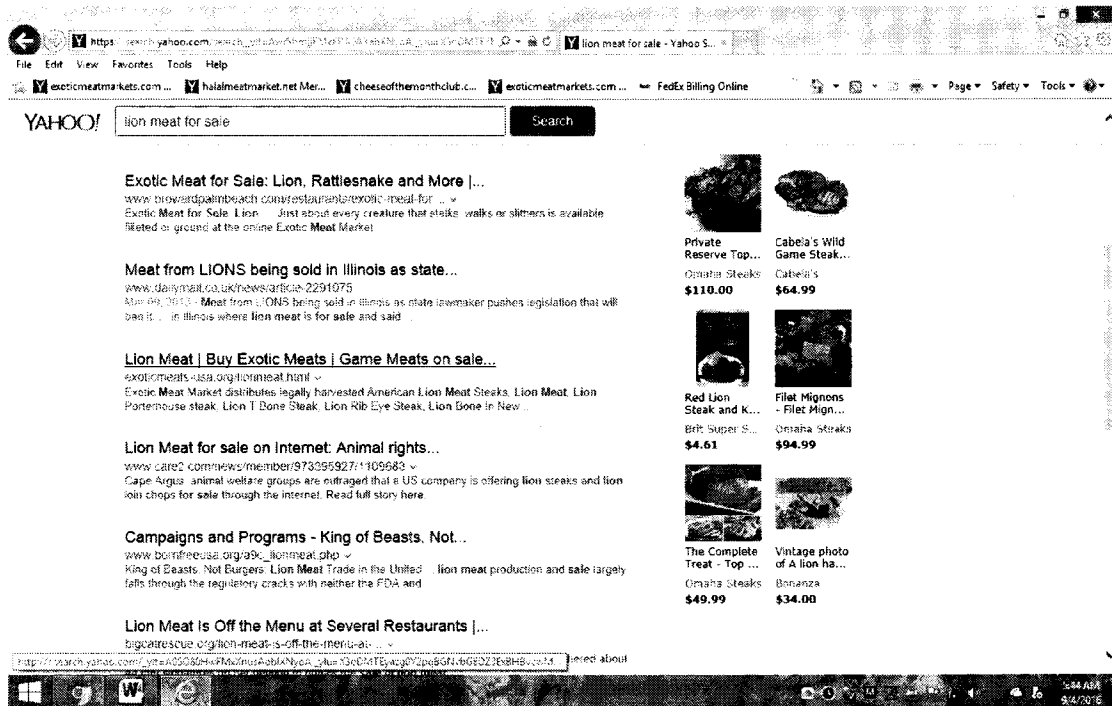
49. Defendant YAHOO and MICROSOFT were stealing intellectual property of Plaintiff without Plaintiff’s knowledge.

50. Defendant YAHOO claims that following advertisers are bidding for the key word “LION MEAT FOR SALE” as of September 4, 2016.

- a. <http://www.mancrates.com/crates/exotic-meats?gclid=CK-G9sre9c4CFVKIfgod964EuA>
- b. [https://www.steaksandgame.com/wagyu-strip-loin-ms8-whole-cut-to-order-182?utm\\_source=google&utm\\_medium=cse&utm\\_campaign=google\\_shopping&utm\\_content=6306803&gclid=CLCmpOXe9c4CFYqCfgodD\\_UEwA](https://www.steaksandgame.com/wagyu-strip-loin-ms8-whole-cut-to-order-182?utm_source=google&utm_medium=cse&utm_campaign=google_shopping&utm_content=6306803&gclid=CLCmpOXe9c4CFYqCfgodD_UEwA)
- c. <http://www.omahasteaks.com/product/Private-Reserve%AE-Top-Sirloins-4-8-oz-00981?AID=1&SRC=AE2886&ITMSUF=NSF&KPID=981&gclid=CJbKtobf9c4CFRSEfgod8acGHQ>
- d. [http://www.cabelas.com/product/Cabelas-Wild-Game-Steaks-Four-Pack/747398.uts?productVariantId=1671389&WT.tsrc=PPC&WT.mc\\_id=Google](http://www.cabelas.com/product/Cabelas-Wild-Game-Steaks-Four-Pack/747398.uts?productVariantId=1671389&WT.tsrc=PPC&WT.mc_id=Google)

ProductAds&WT.z\_mc\_id1=60016669&rid=20&gclid=CPKl4qDf9c4CFYdcfgo  
d7XcANQ&gclsrc=aw.ds

- e. [http://www.britsuperstore.com/usa/food.html?gclid=CO-  
yt7Hf9c4CFQpsfgod1A8Cfg&p=381#products-list-item-46753](http://www.britsuperstore.com/usa/food.html?gclid=CO-<br/>yt7Hf9c4CFQpsfgod1A8Cfg&p=381#products-list-item-46753)
- f. [http://www.omahasteaks.com/product/Filet-Mignons-8-5-oz-  
00464?AID=1&SRC=AE2886&ITMSUF=NSF&KPID=464&gclid=CI6\\_xc3f9c4  
CFVKIfgodawIFdQ](http://www.omahasteaks.com/product/Filet-Mignons-8-5-oz-<br/>00464?AID=1&SRC=AE2886&ITMSUF=NSF&KPID=464&gclid=CI6_xc3f9c4<br/>CFVKIfgodawIFdQ)
- g. [http://www.omahasteaks.com/product/The-Complete-Treat-  
04109?AID=1&SRC=AE2886&ITMSUF=NSF&KPID=4109&gclid=CLvAnuHf  
9c4CFQtXfgodBcwPxxg](http://www.omahasteaks.com/product/The-Complete-Treat-<br/>04109?AID=1&SRC=AE2886&ITMSUF=NSF&KPID=4109&gclid=CLvAnuHf<br/>9c4CFQtXfgodBcwPxxg)
- h. [http://www.bonanza.com/listings/Vintage-photo-of-A-lion-having-his-fresh-meat-  
/371950516?goog\\_pla=1&gpid=68416460221&keyword=&goog\\_pla=1&pos=2o  
8&ad\\_type=pla&gclid=CObt2YXg9c4CFUhufgodTcYM0A](http://www.bonanza.com/listings/Vintage-photo-of-A-lion-having-his-fresh-meat-<br/>/371950516?goog_pla=1&gpid=68416460221&keyword=&goog_pla=1&pos=2o<br/>8&ad_type=pla&gclid=CObt2YXg9c4CFUhufgodTcYM0A)





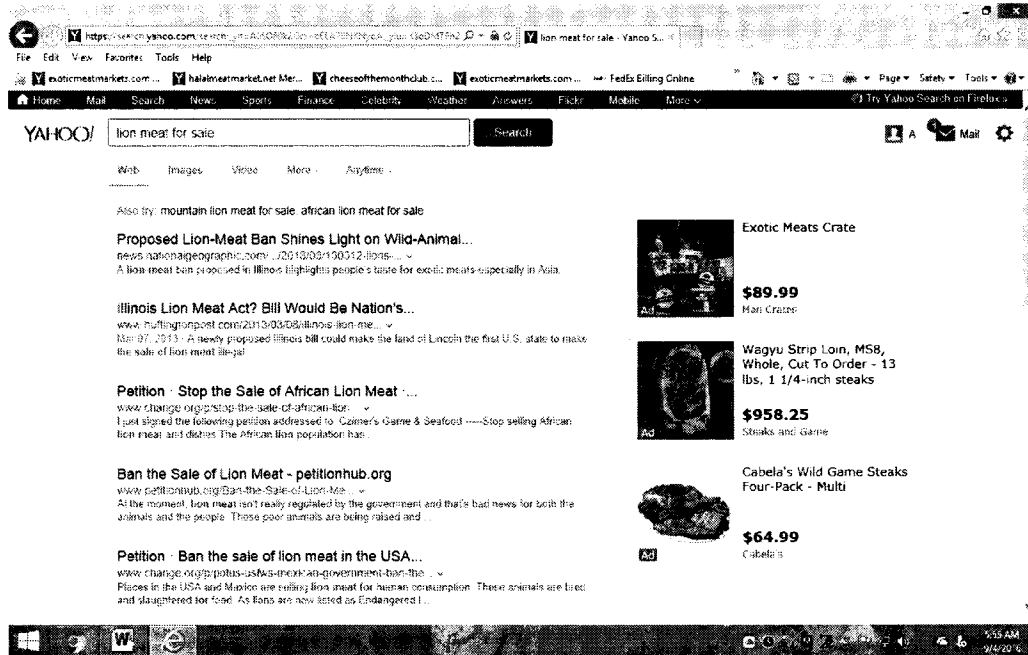
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The screenshot shows a Yahoo! search results page for the query 'lion meat for sale'. The search bar at the top contains the text 'lion meat for sale'. Below the search bar, there are several search results. The first result is 'Also try: mountain lion meat for sale, african lion meat for sale'. The second result is 'Like lion meat? Get it while it's still legal - NY...' with a link to 'www.nydailynews.com/life/style/eats/lion-meat...'. The third result is 'Lions on the Menu: A Deadly Delicacy - Born Free...' with a link to 'www.bornfreeusa.org/articles.php?pr=3051&noy=1...'. The fourth result is 'Exotic Meat for Sale: Lion, Rattlesnake and More [...]' with a link to 'www.browardpalmbeach.com/restaurants/exotic-meat-for...'. The fifth result is 'Meat from LIONS being sold in Illinois as state...' with a link to 'www.daily Herald.com/news/article-2281075...'. The sixth result is 'Lion Meat | Buy Exotic Meats | Game Meats on sale...' with a link to 'exoticmeats-usa.org/lionmeat.html'. On the right side of the page, there is a 'Sponsored' section with several product listings: 'Exotic Meats Crate' for \$89.99, 'Wagyu Strip Loin, MSB, ...' for \$958.25, 'Private Reserve Top...' for \$110.00, 'Cabela's Wild Game Steak...' for \$64.99, 'Red Lion Steak and K...' for \$4.61, and 'Filet Mignons...' for \$94.99. The bottom of the page shows a Windows taskbar with the date and time '9/4/2016 5:41 AM'.

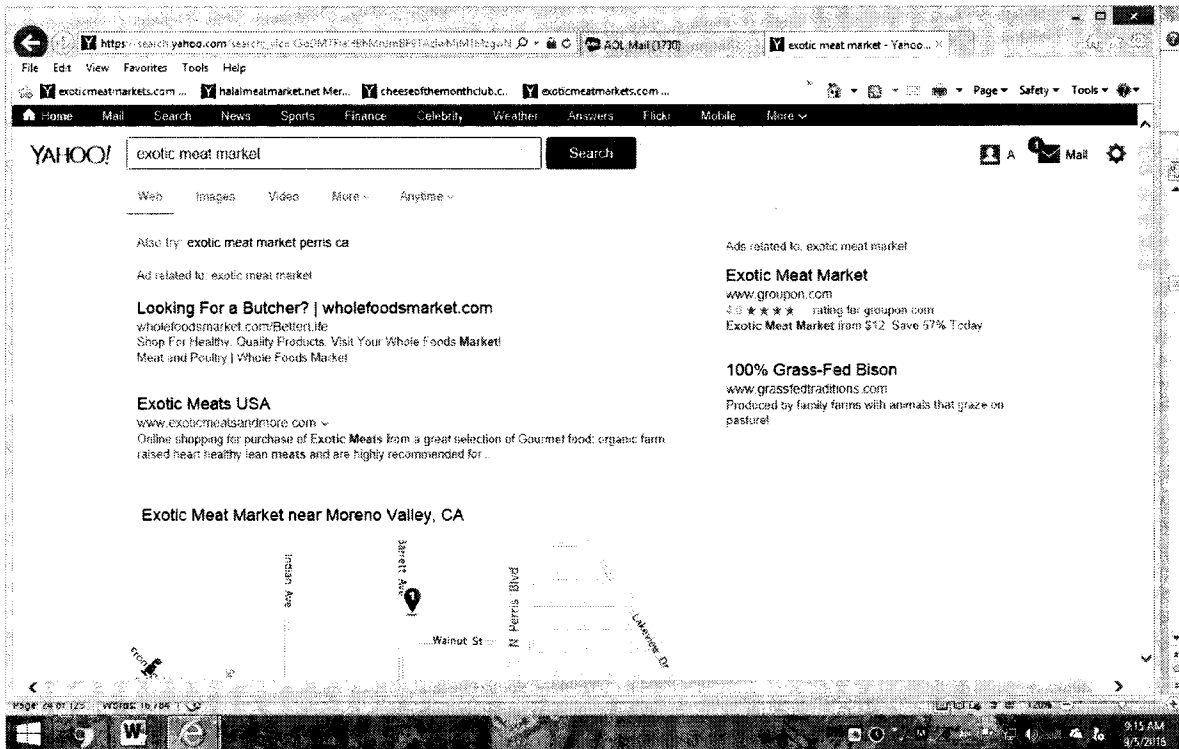
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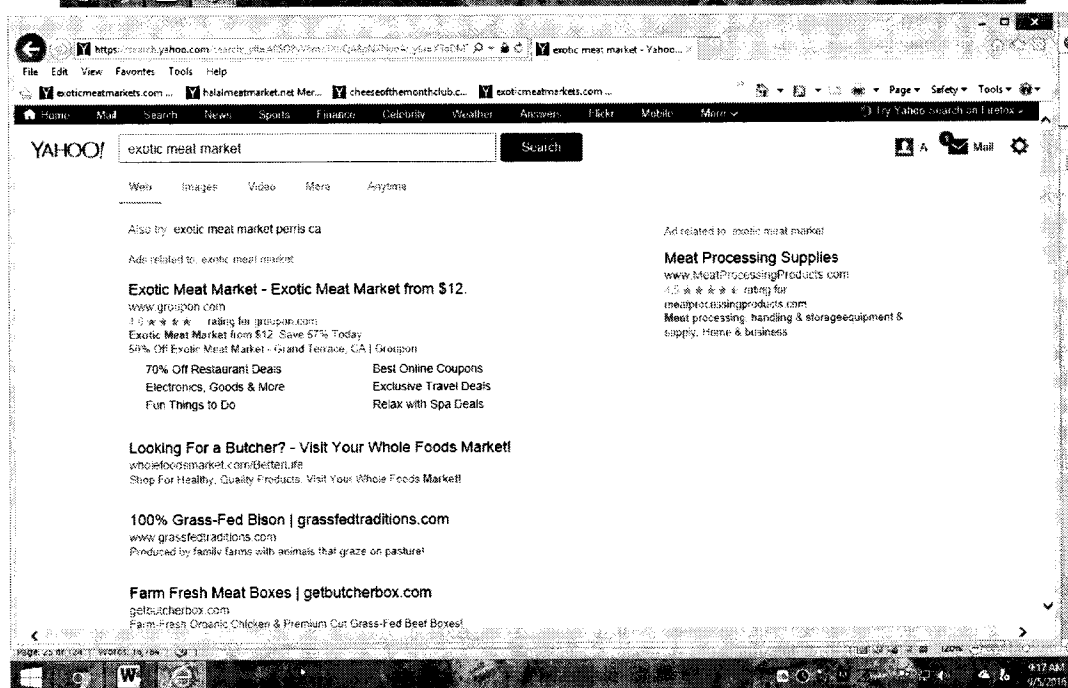
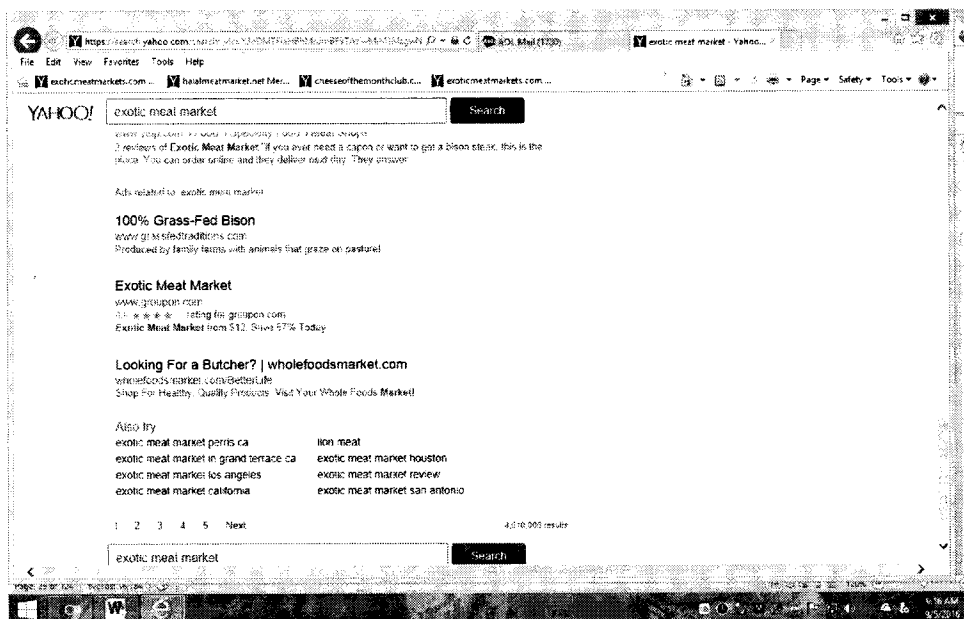
The screenshot shows a Yahoo! search results page for the query 'lion meat for sale'. The search bar at the top contains the text 'lion meat for sale'. Below the search bar, there are several search results. The first result is 'Also try: mountain lion meat for sale, african lion meat for sale'. The second result is 'Exotic Meats USA - Lion' with a link to 'www.exoticmeatsandmore.com/index.aspx'. The third result is 'Lion meat tacos - National Geographic News' with a link to 'news.nationalgeographic.com/news/2013/3/130314-lion...'. The fourth result is 'Illinois lawmaker seeks to ban sale of lion meat [...]' with a link to 'www.foxnews.com/politics/2013/03/14/illinois-lawmaker...'. The fifth result is 'Petition - USDA: No More Lion Burgers! Ban the ...' with a link to 'www.change.org/petition-lion-burgers-ban-the-sale...'. The sixth result is 'Lion Meat Tacos - FOR SALE If - YouTube' with a link to 'www.youtube.com/watch?v=RYGxyTSD4...'. On the right side of the page, there is a 'Sponsored' section with several product listings: 'Exotic Meats Crate' for \$89.99, 'Wagyu Strip Loin, MSB, ...' for \$958.25, 'Private Reserve Top...' for \$110.00, 'Cabela's Wild Game Steak...' for \$64.99, 'Red Lion Steak and K...' for \$4.61, and 'The Complete Treat - Top ...' for \$49.99. The bottom of the page shows a Windows taskbar with the date and time '9/4/2016 5:41 AM'.

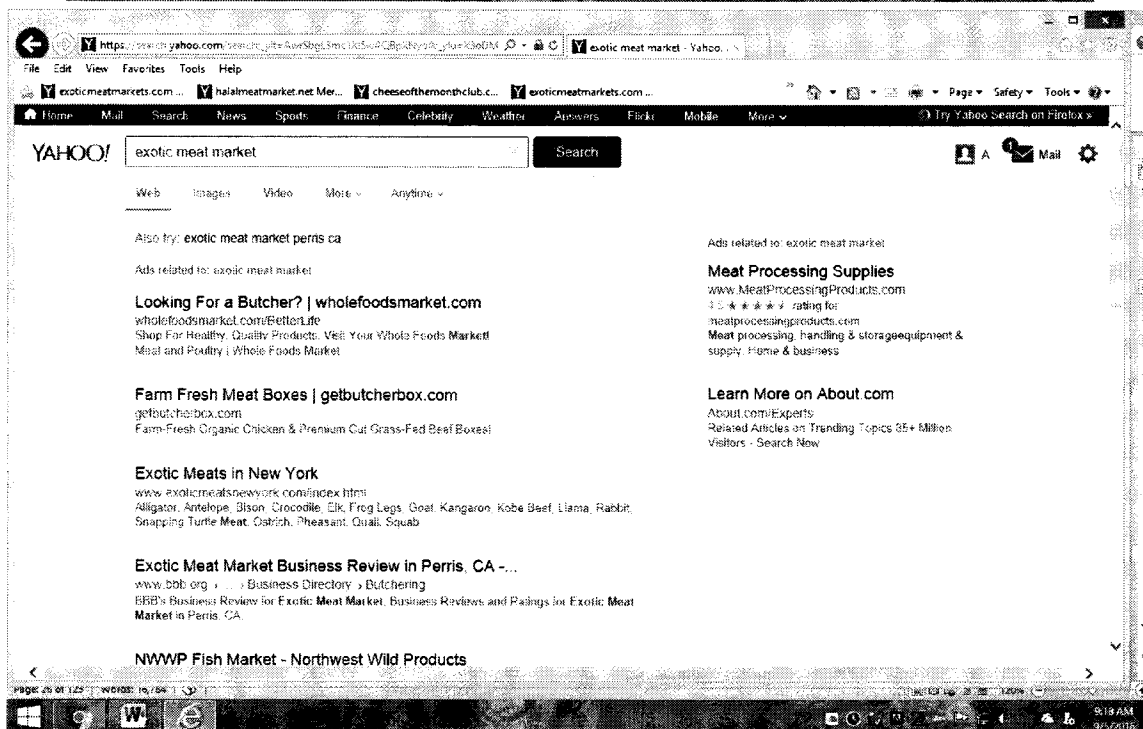
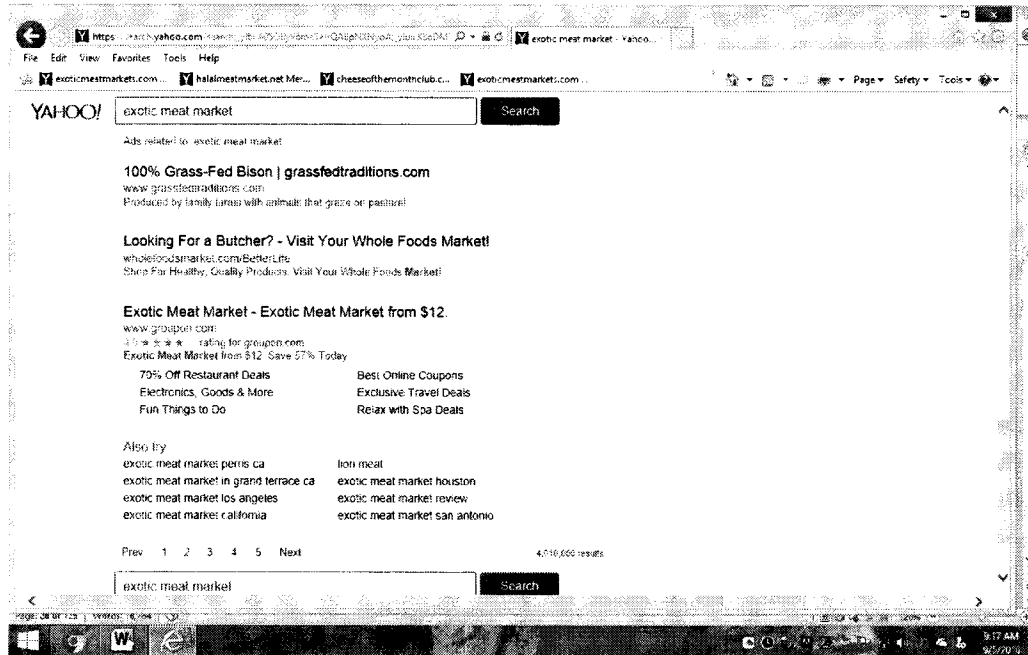


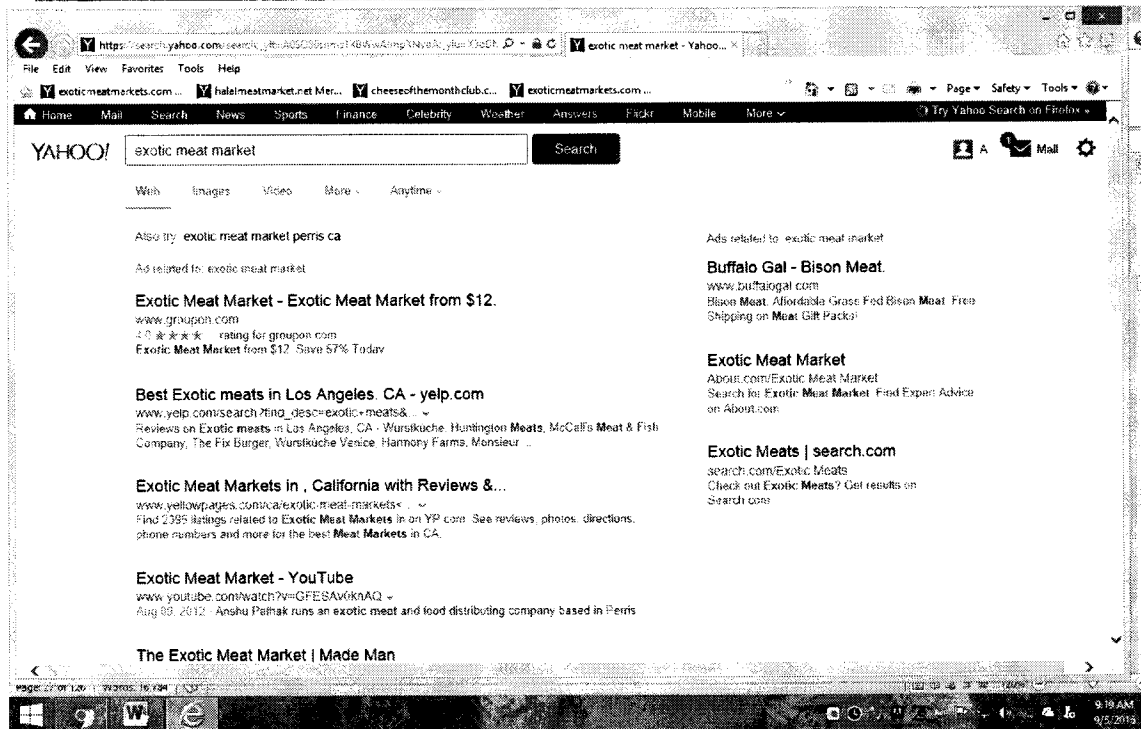
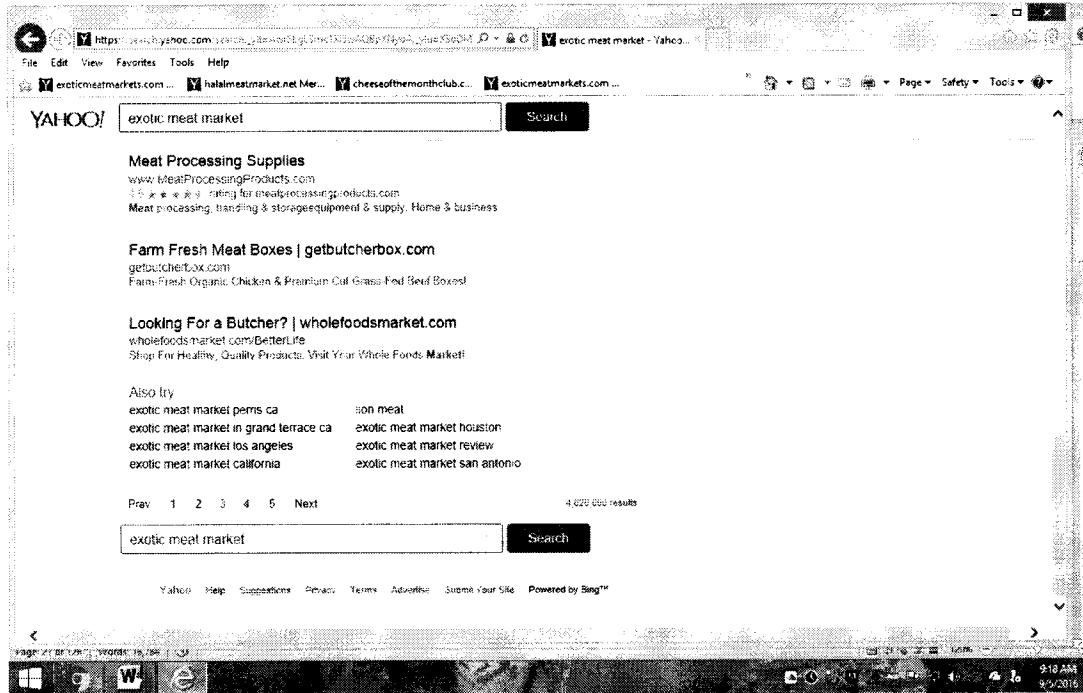


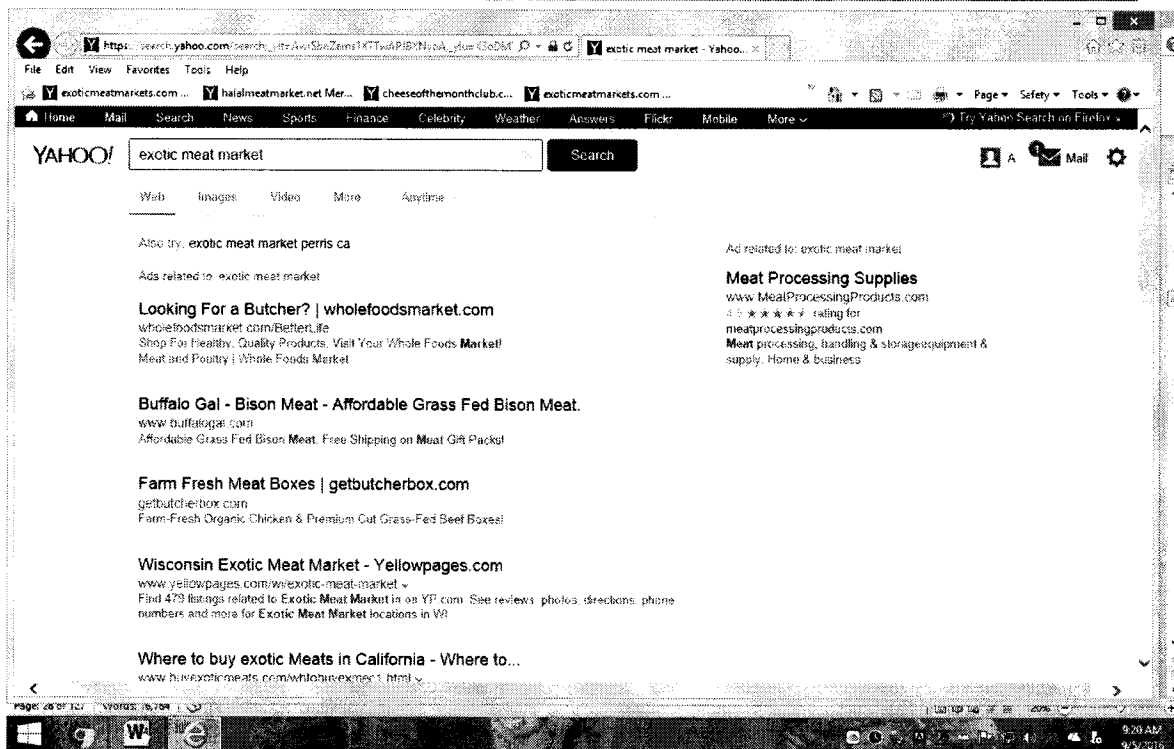
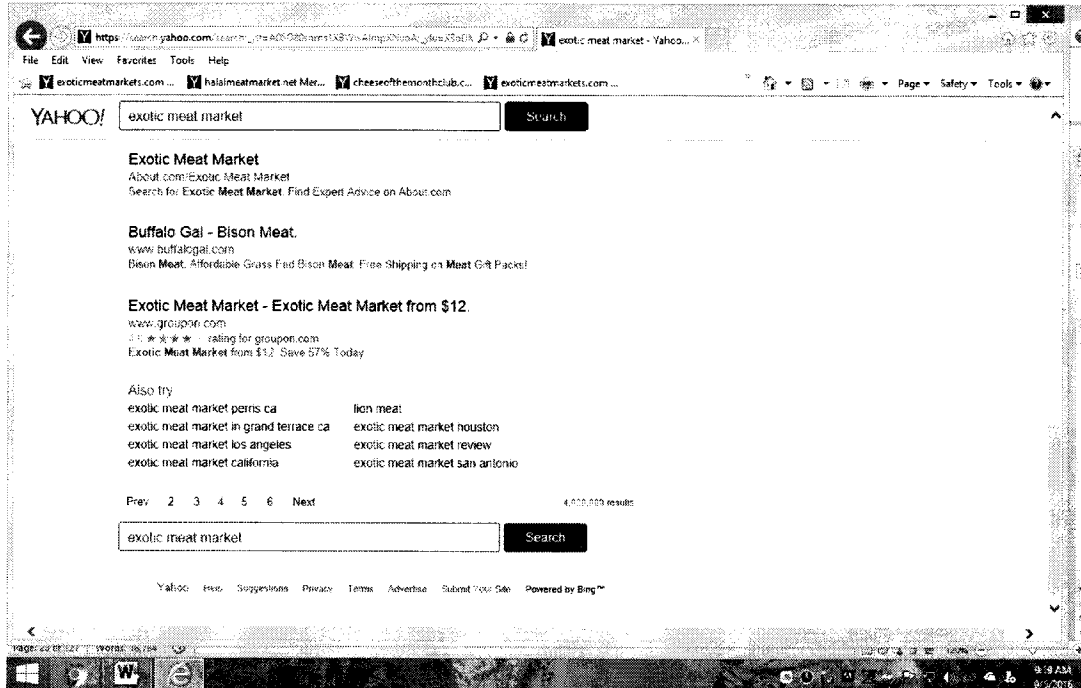
51. Defendant YAHOO claims that on September 5, 2016 following advertisers are bidding voluntarily for Plaintiff's Trademark "EXOTIC MEAT MARKET" as KEY WORD.

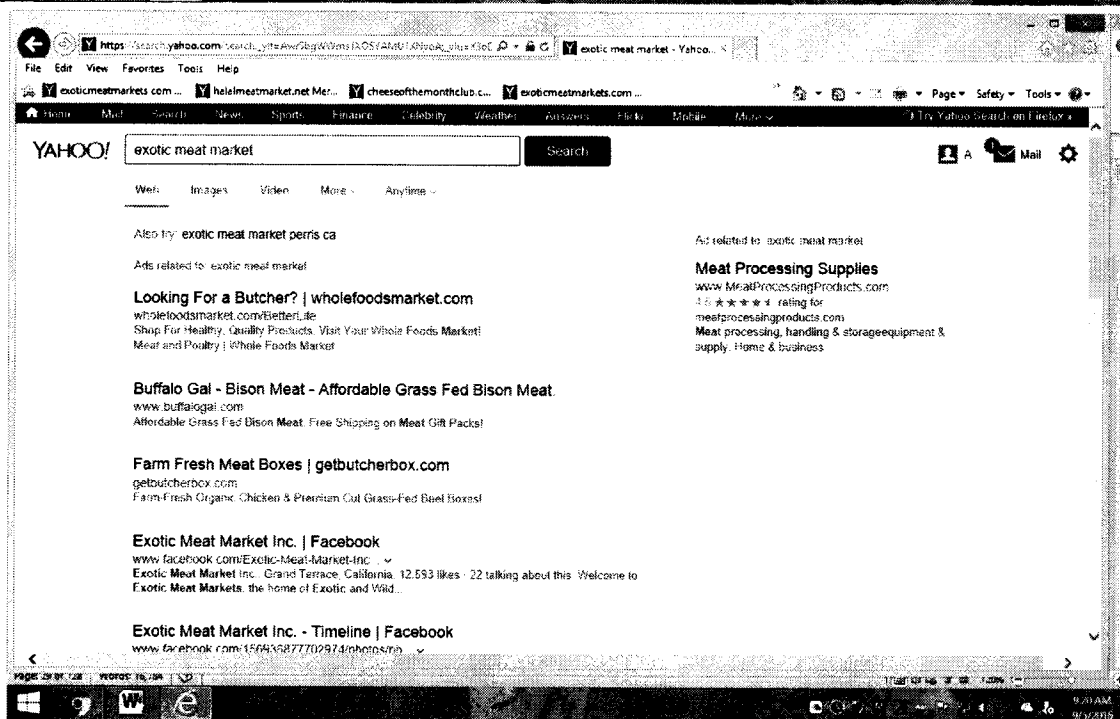
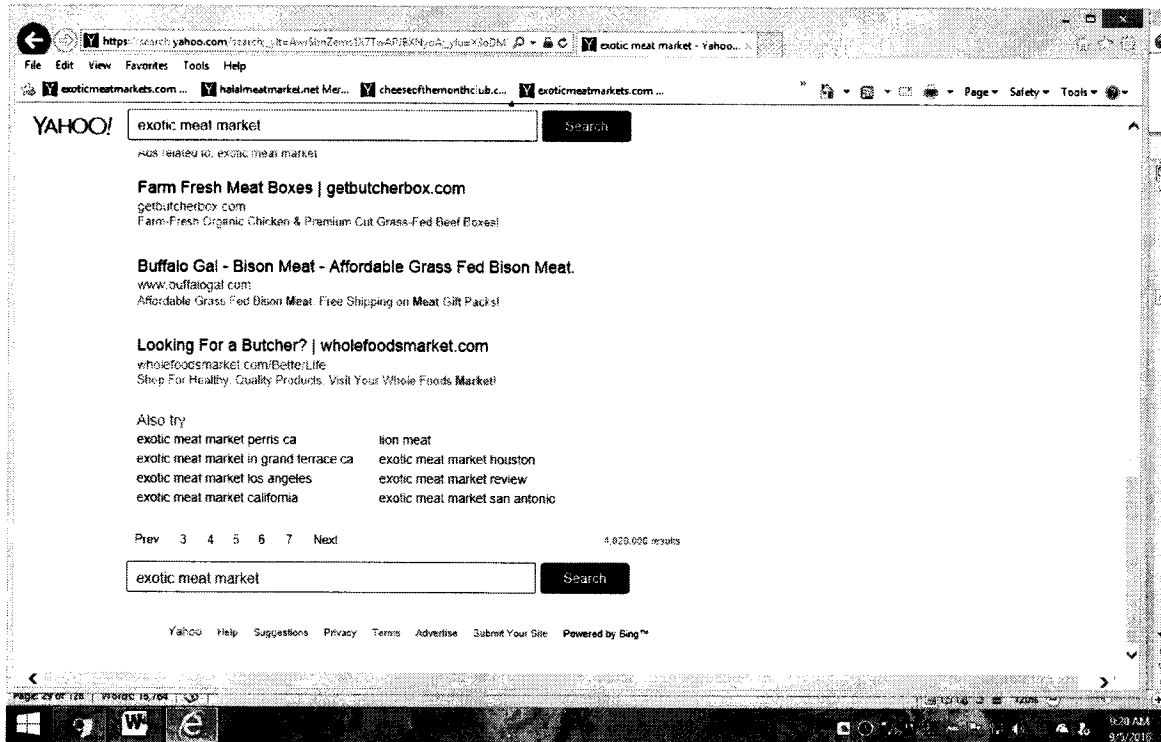




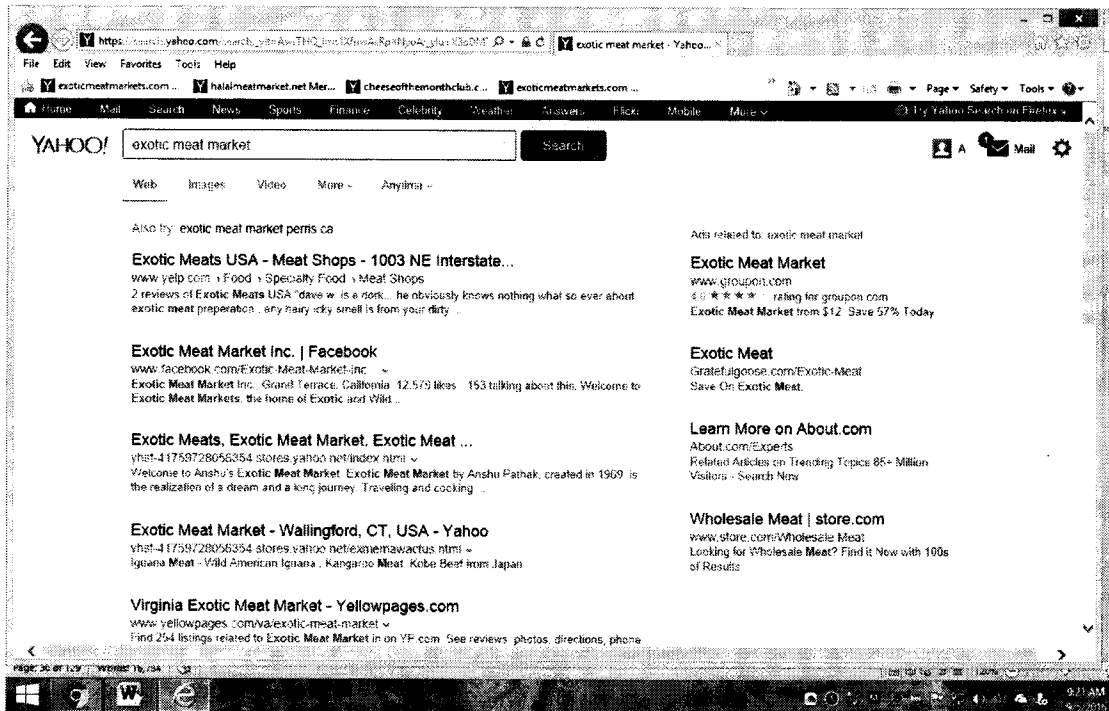
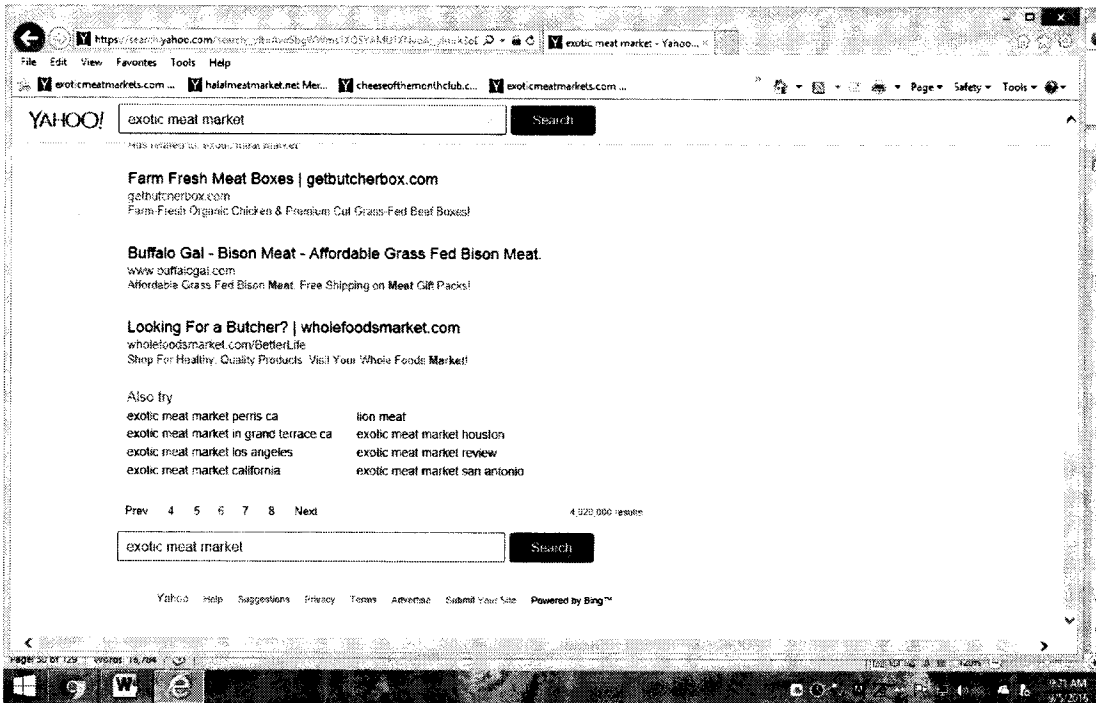






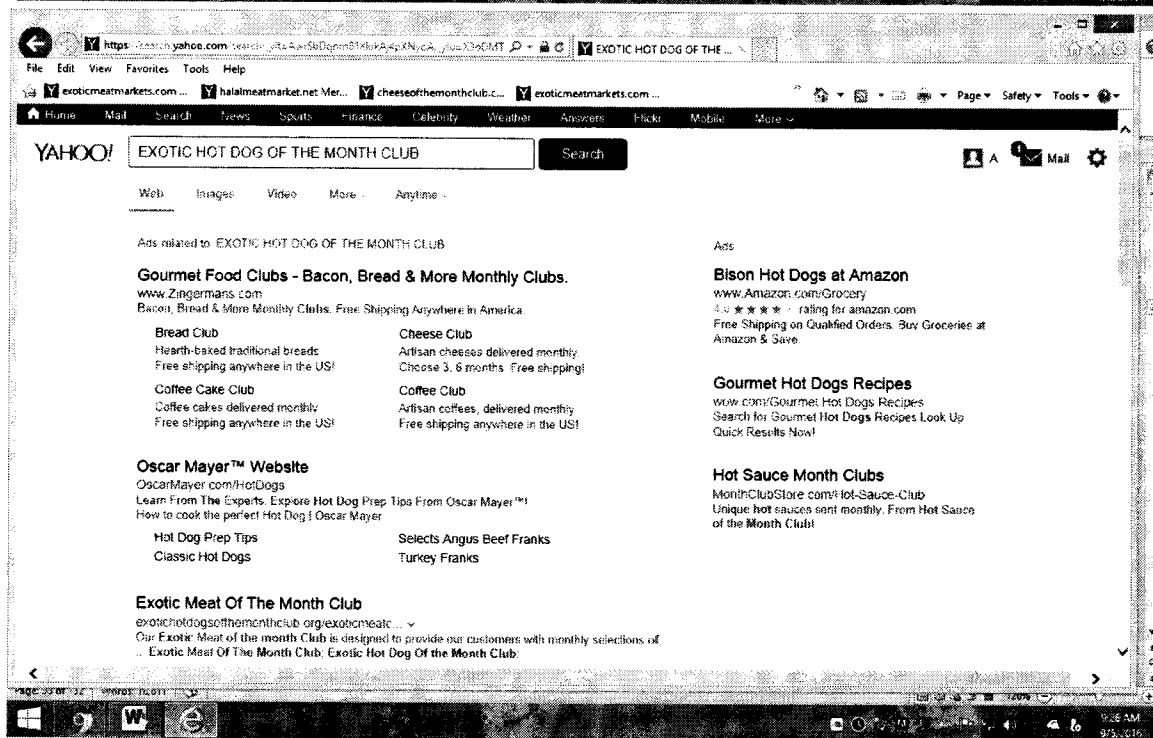
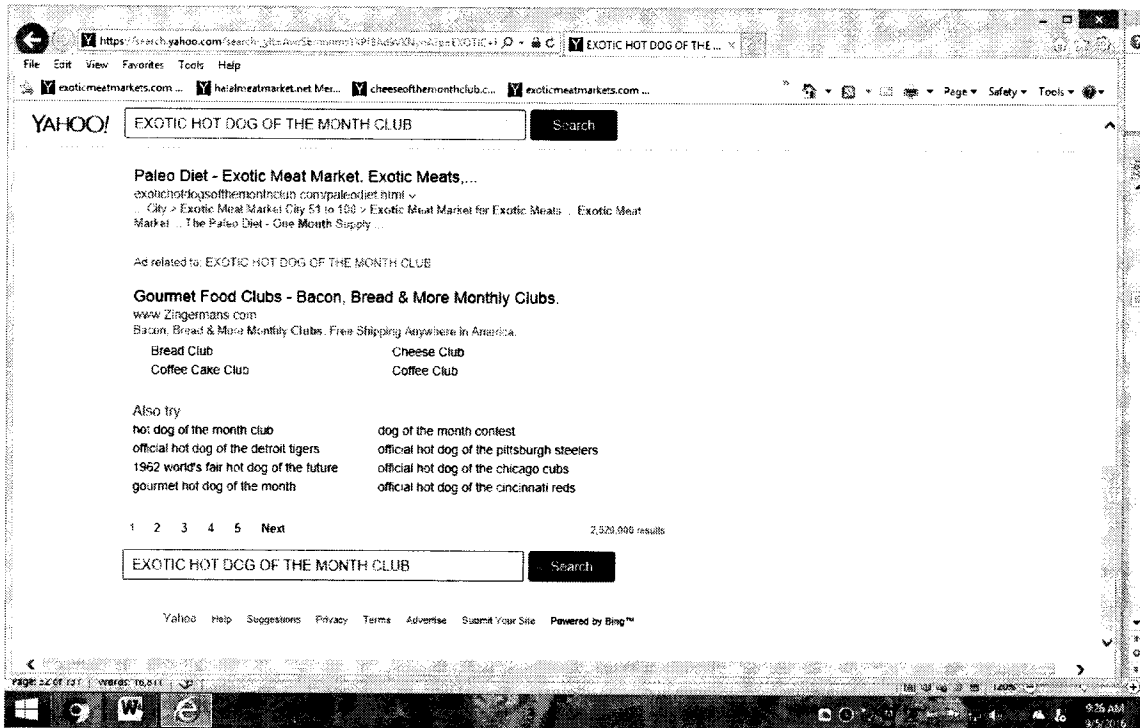


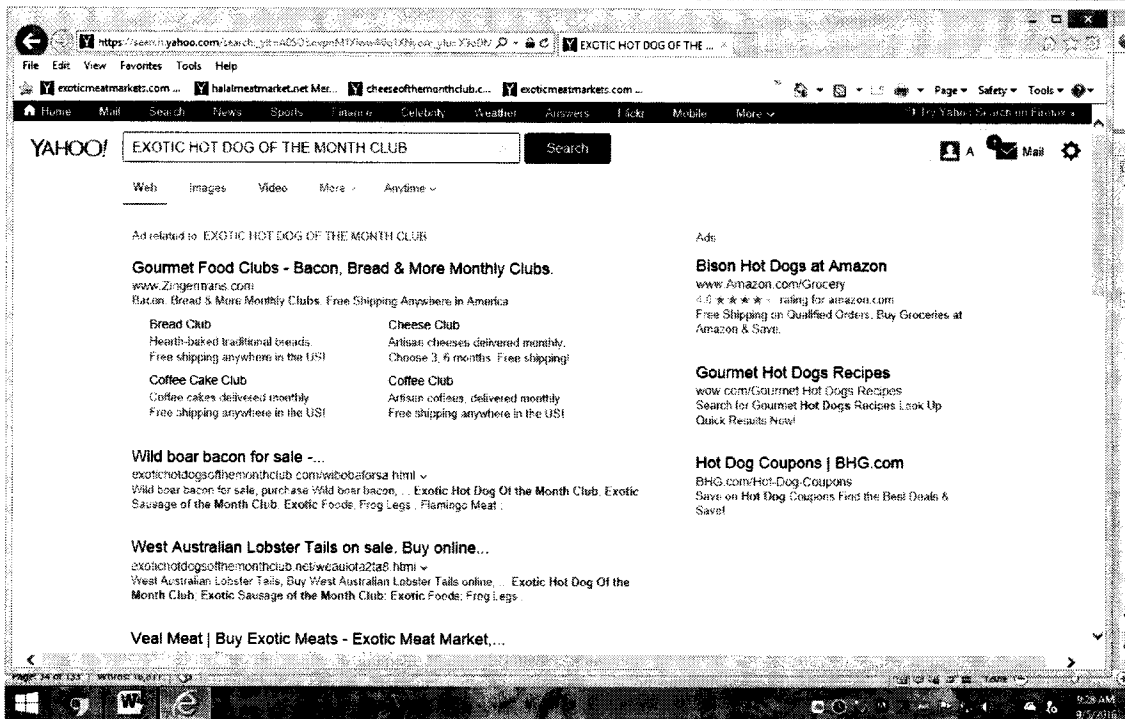
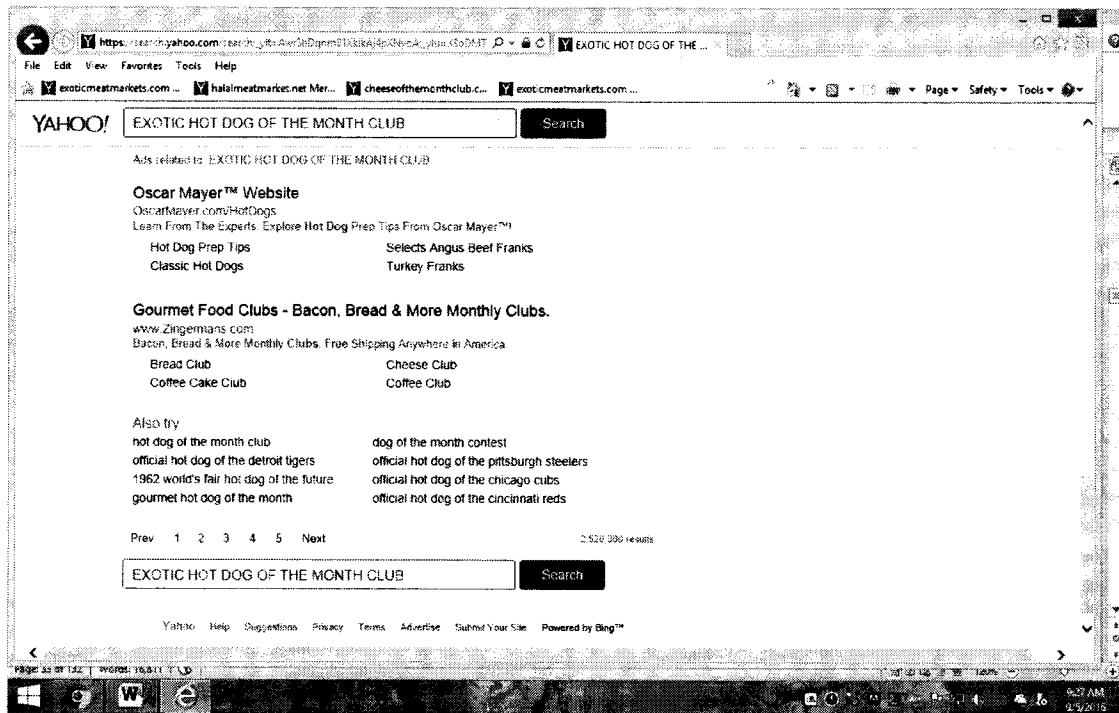


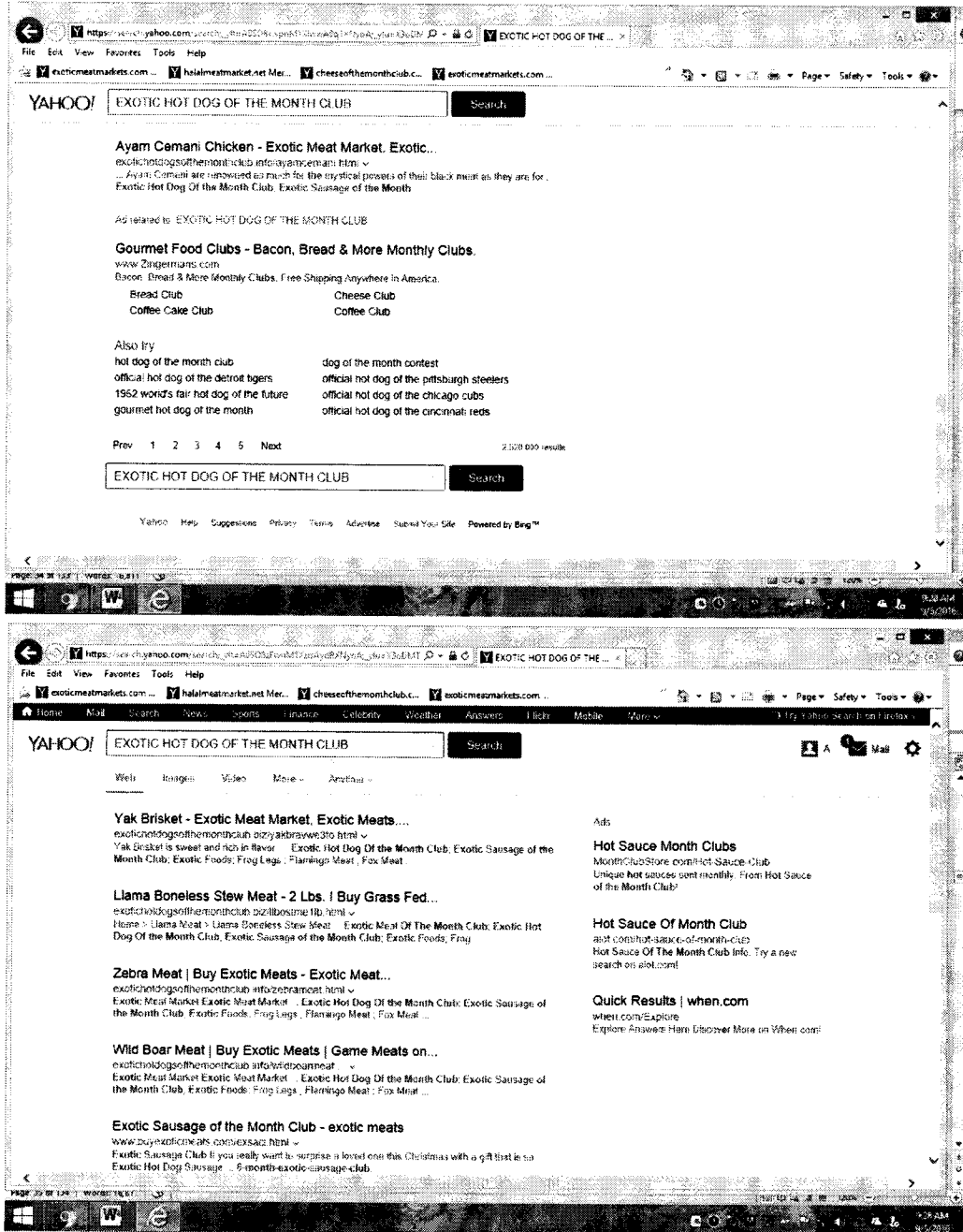


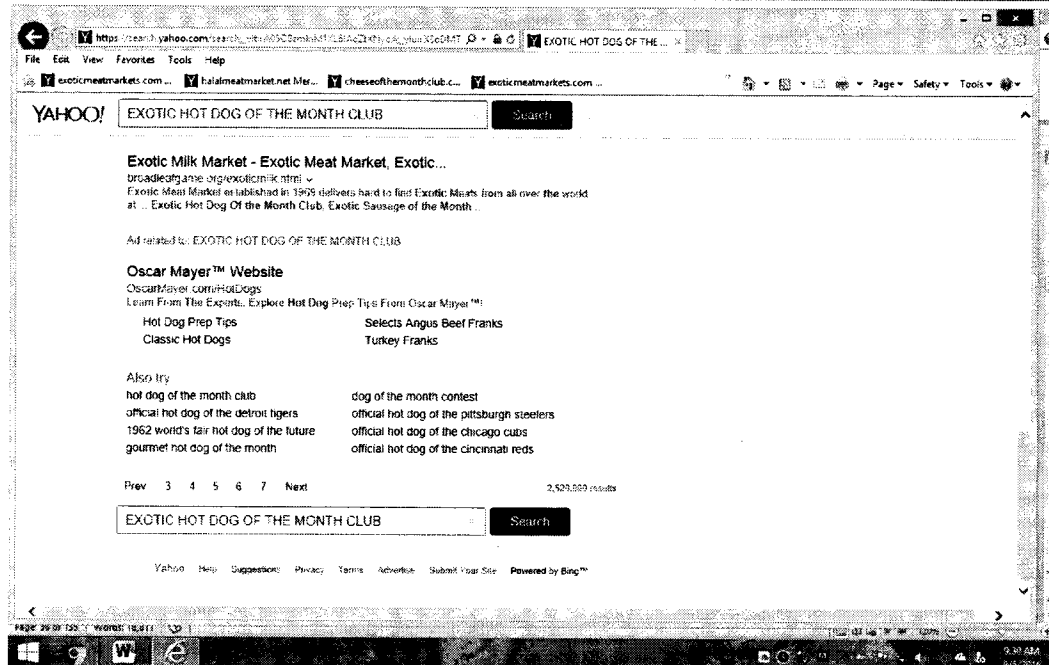
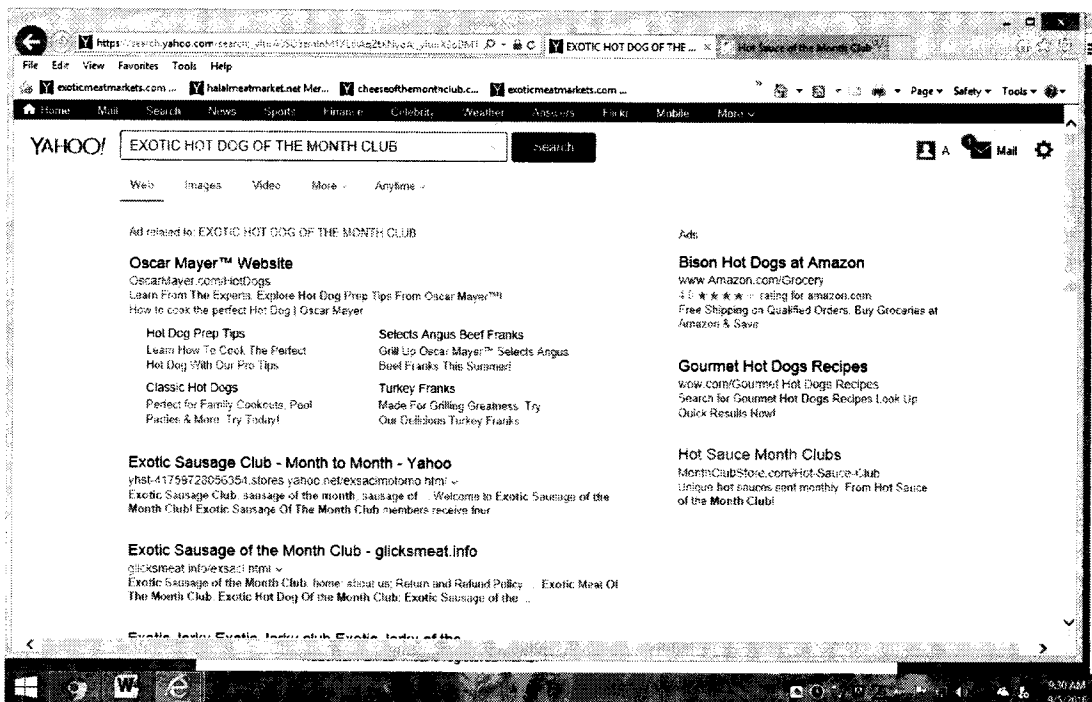


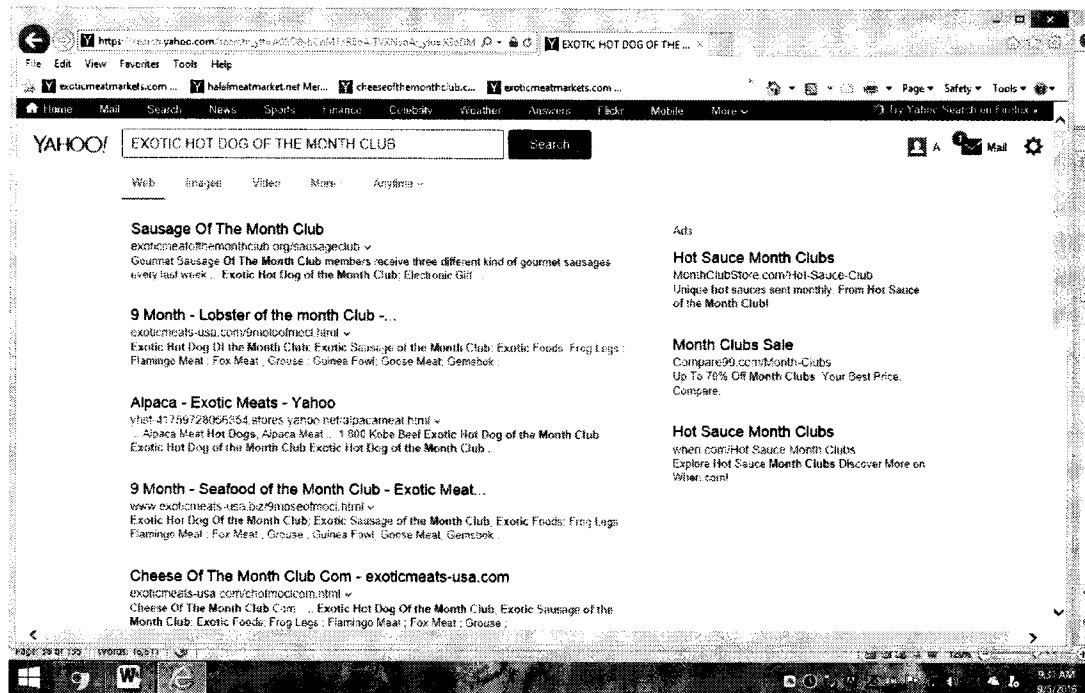




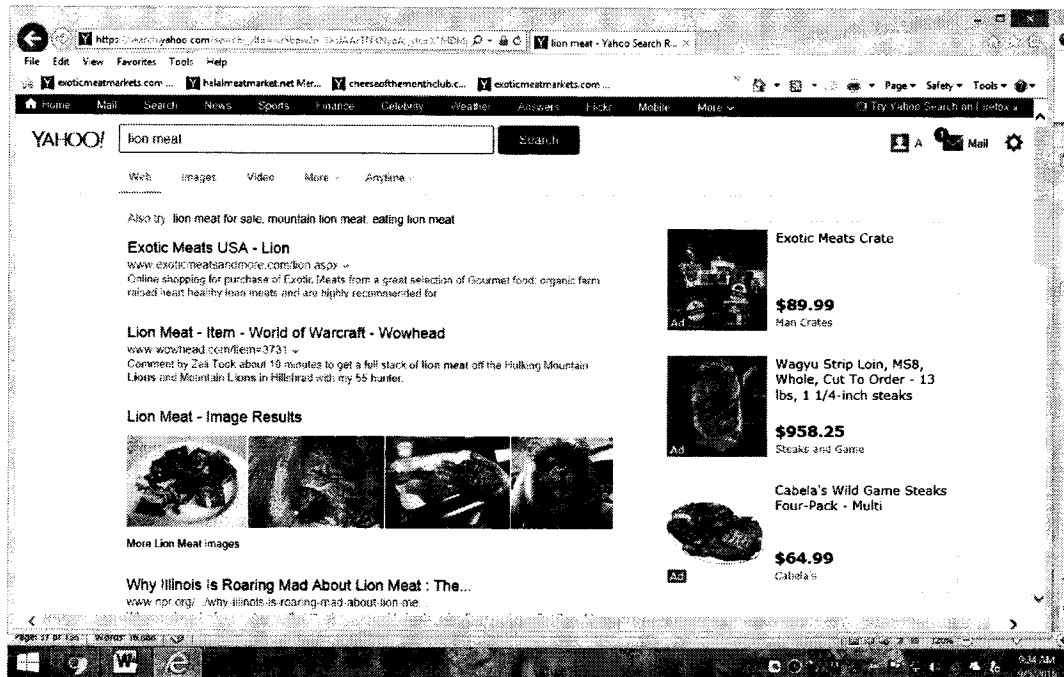






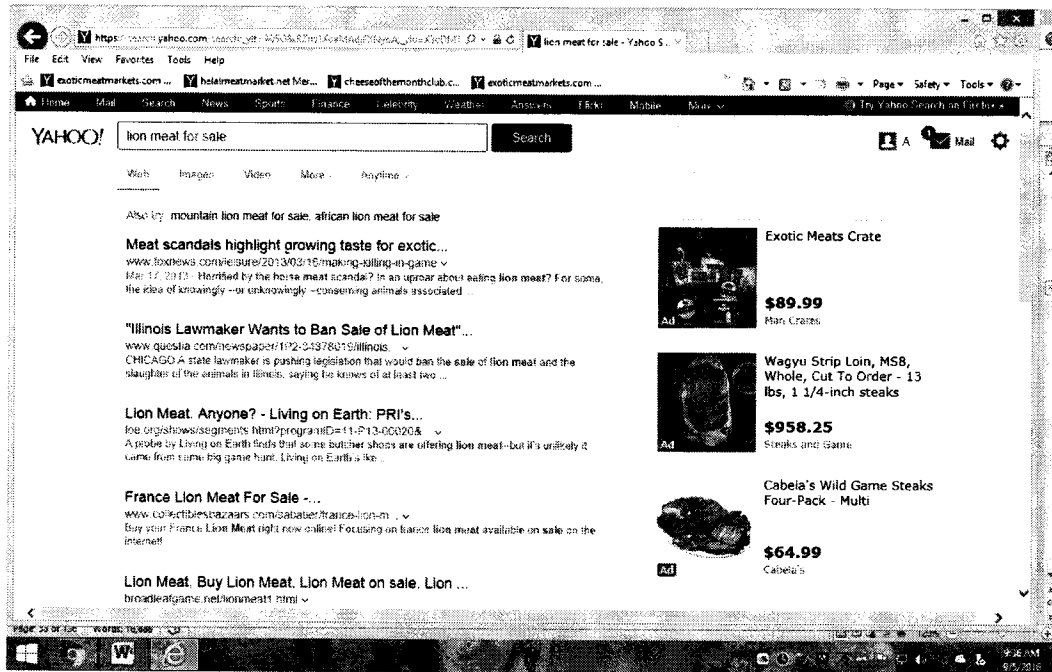


53. Defendant YAHOO claims that following advertisers bid for the KEY WORD “LION MEAT” on September 5, 2016.

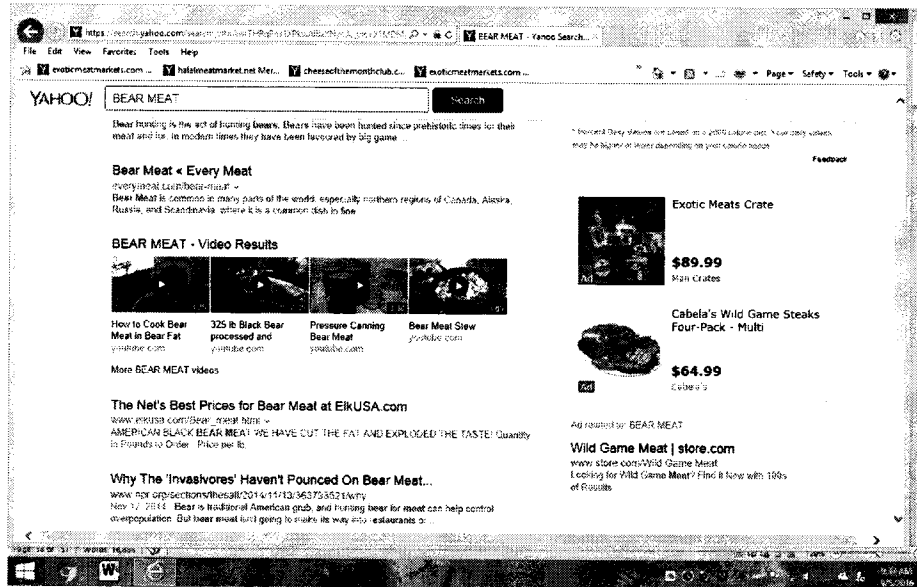


54. Defendant YAHOO claims that following advertisers bid for the KEY WORD “LION MEAT FOR SALE” on September 5, 2016.

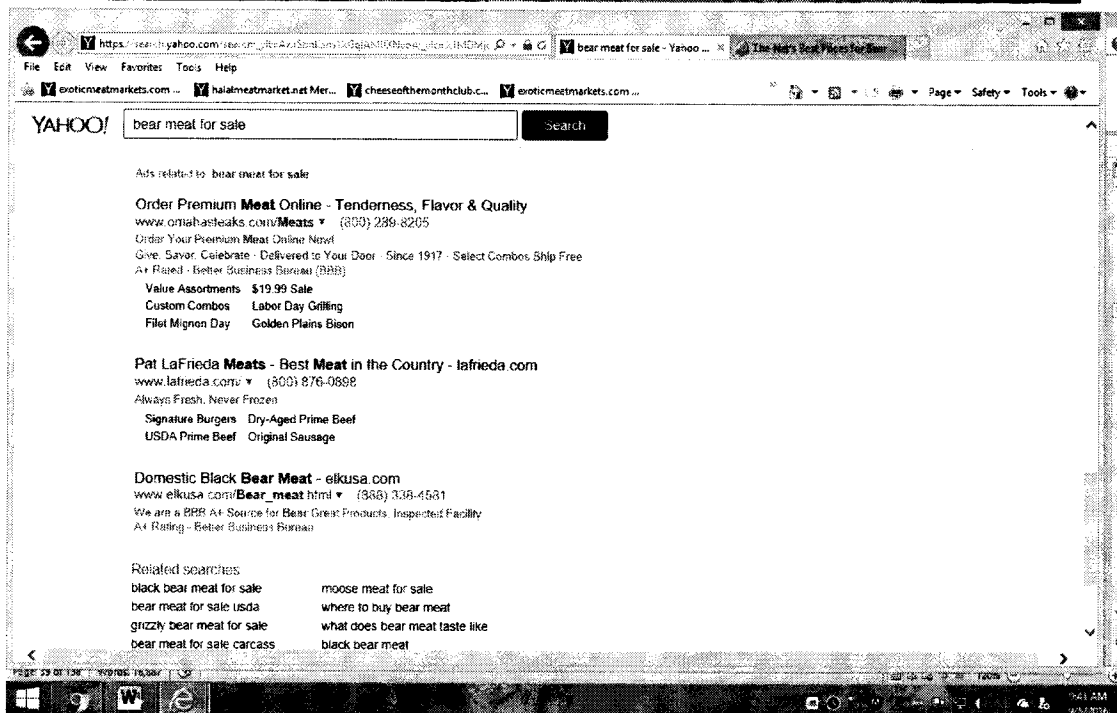
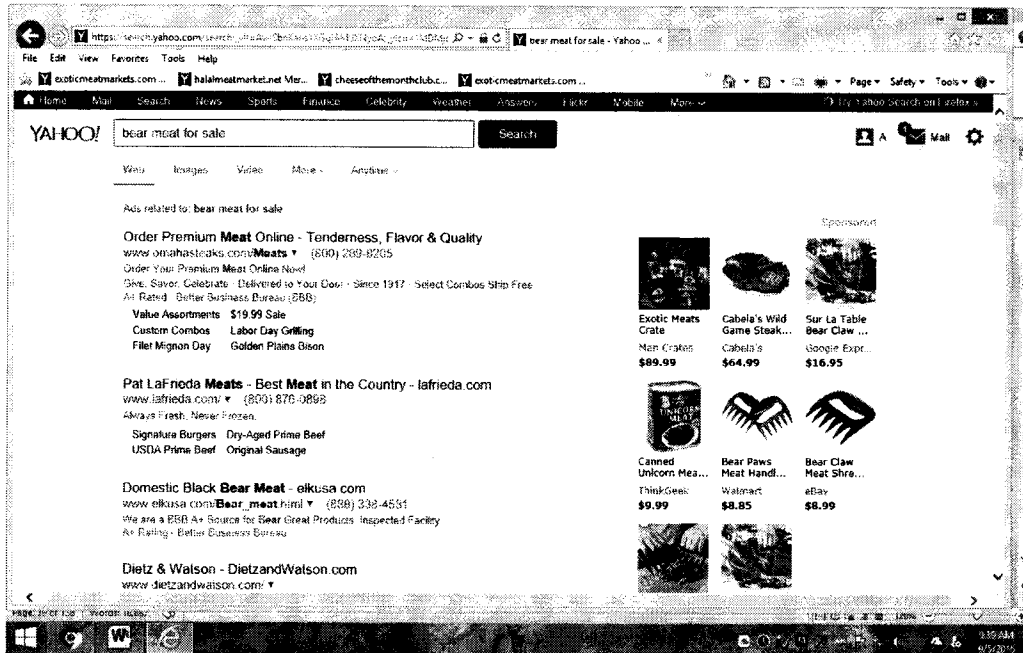


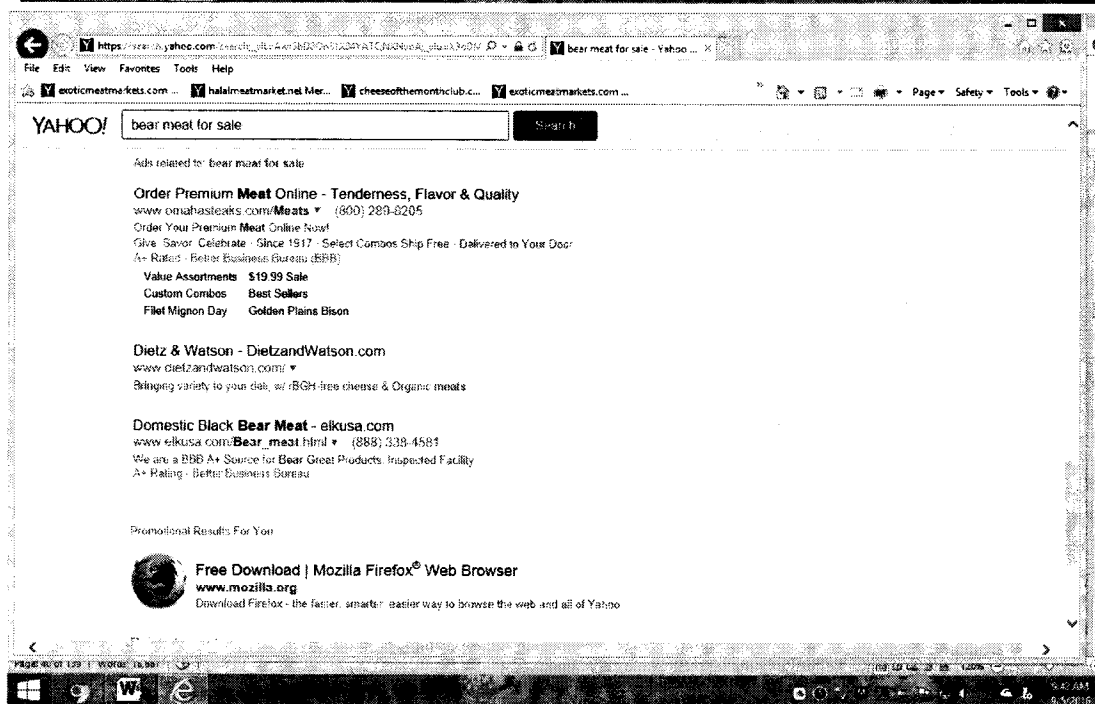
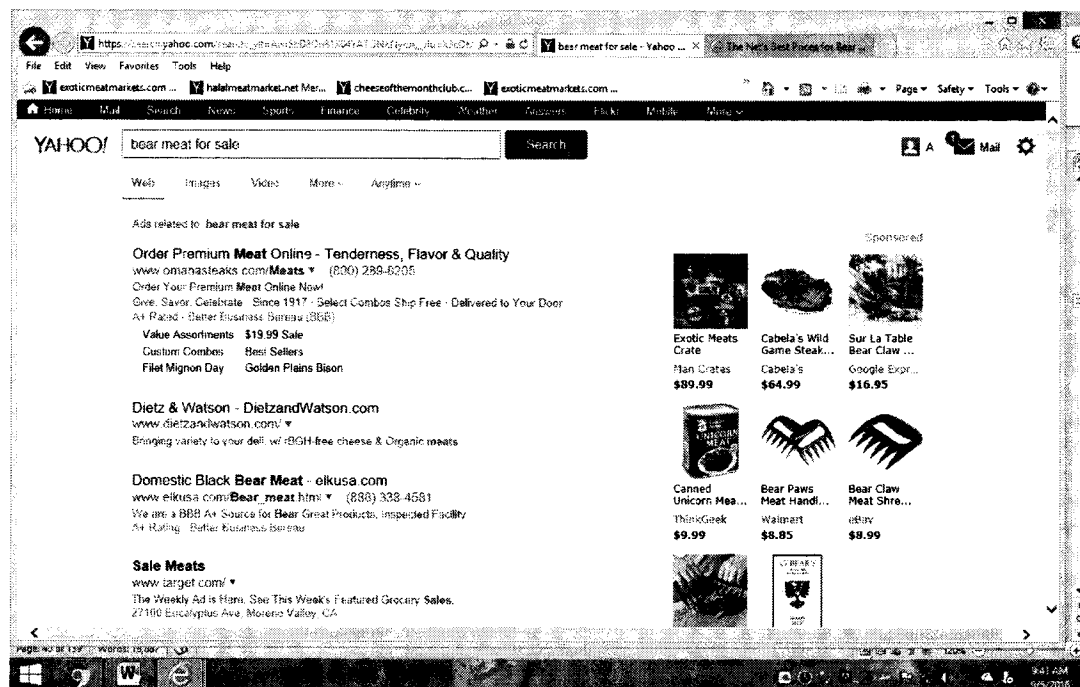


55. Defendant YAHOO claims that following advertisers bid for the KEY WORD "BEAR MEAT" on September 5, 2016.



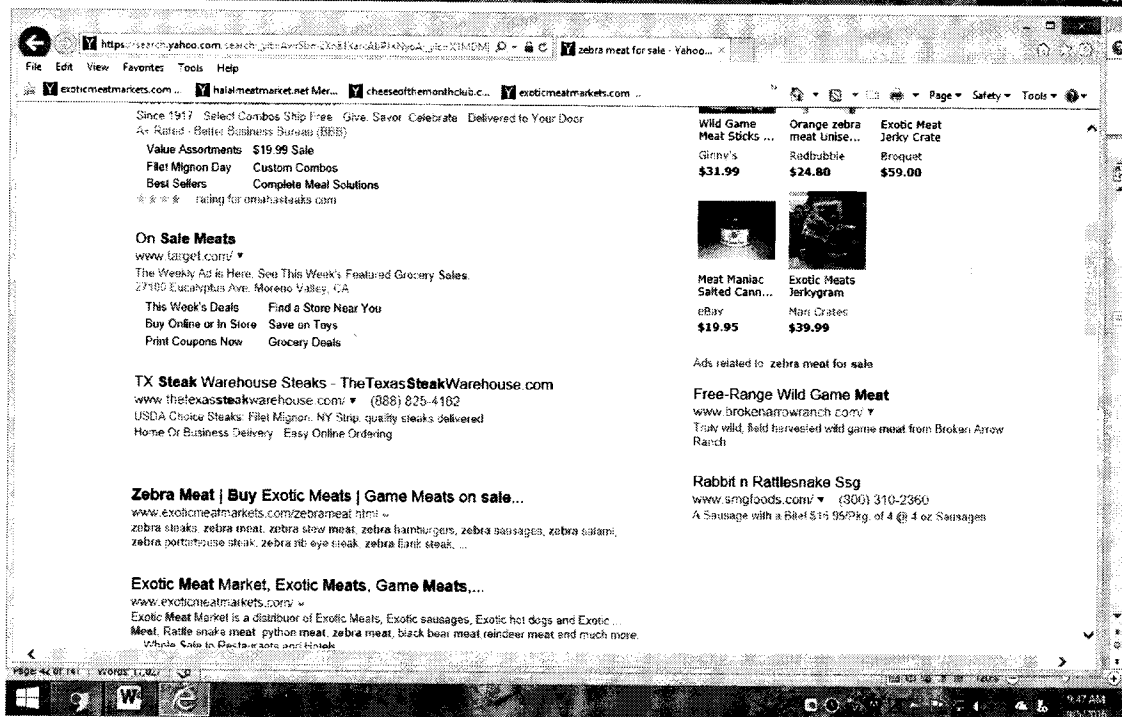
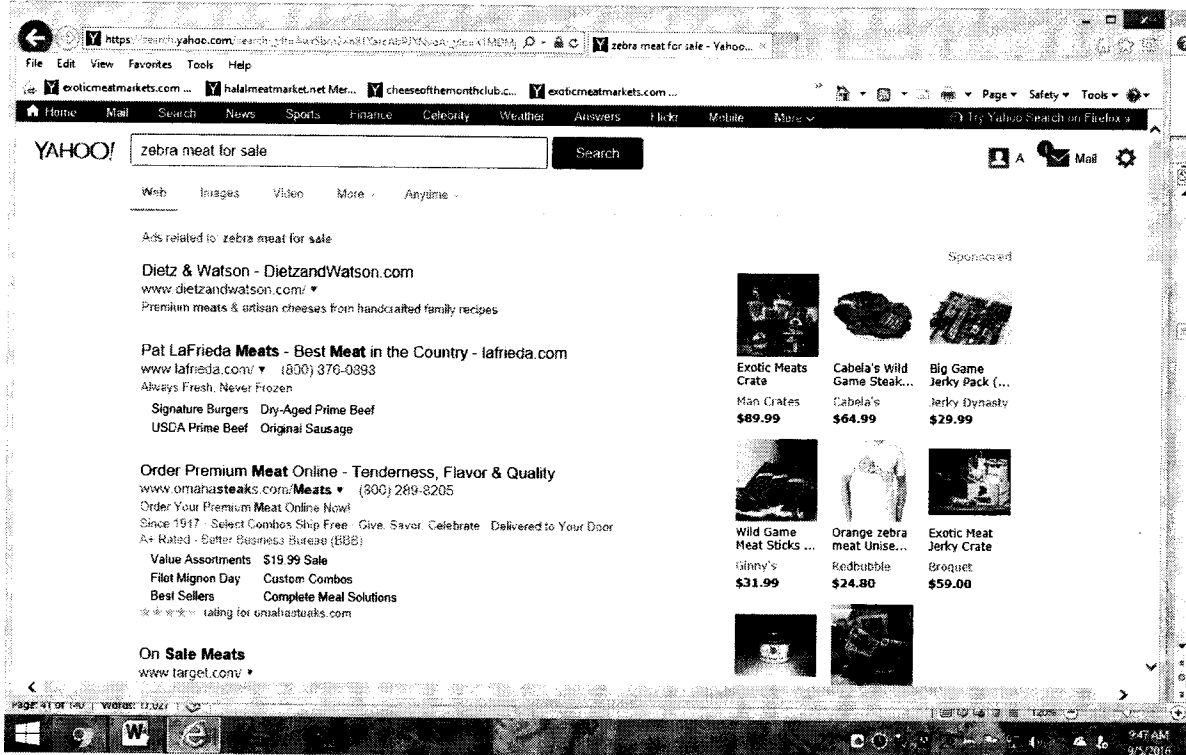
56. Defendant YAHOO claims that following advertisers bid for the KEY WORD "BEAR MEAT FOR SALE" on September 5, 2016.

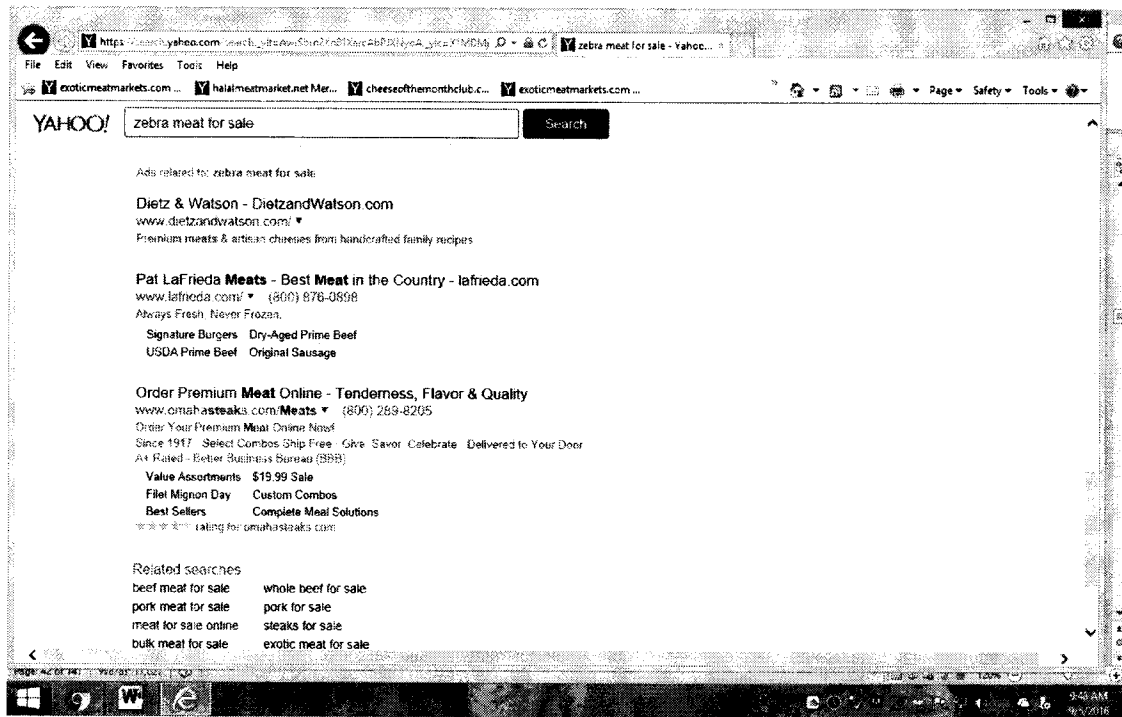




57. Defendant YAHOO claims that following advertisers bid for the KEY WORD “ZEBRA MEAT FOR SALE” on September 5, 2016.

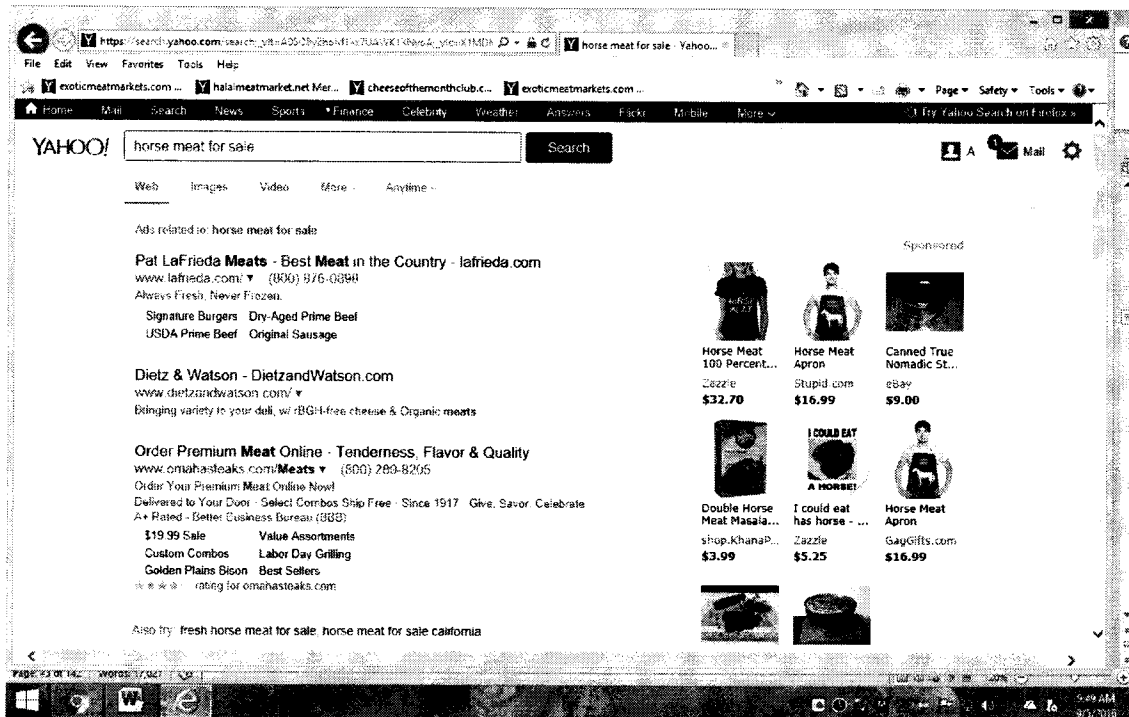


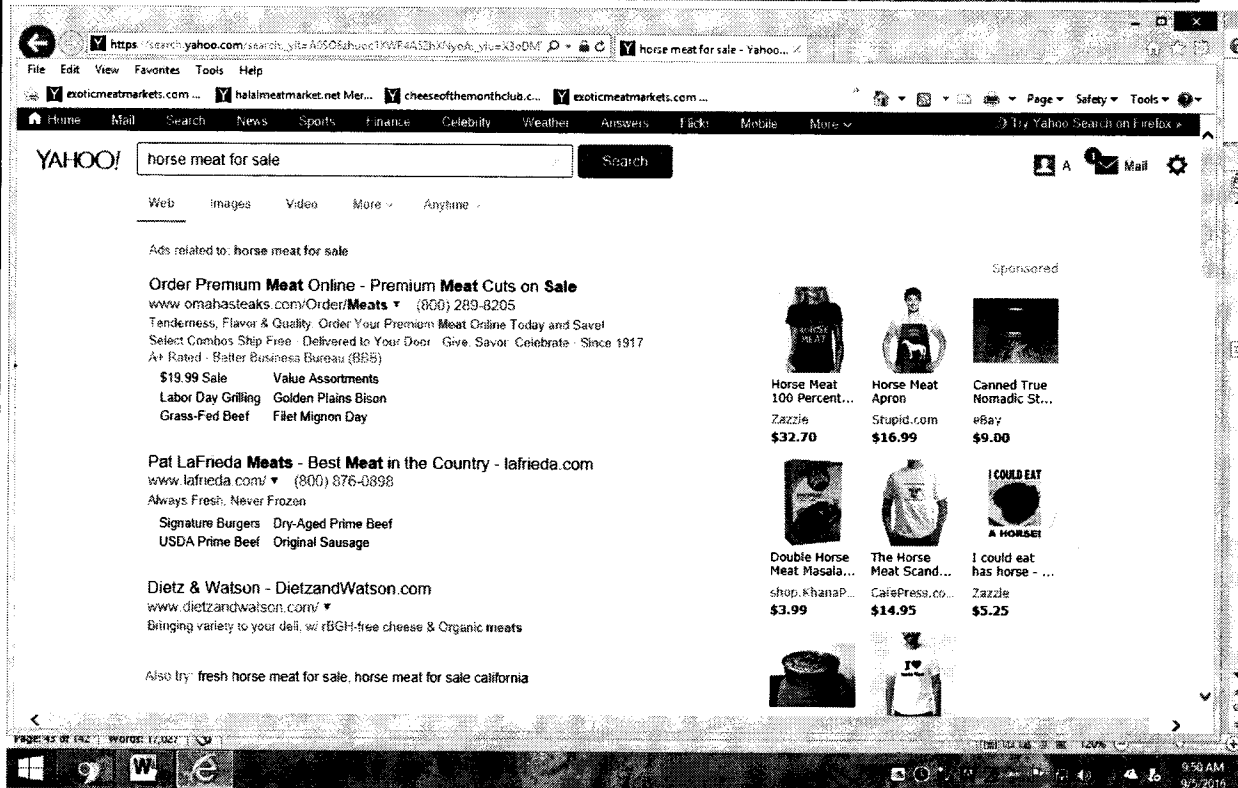
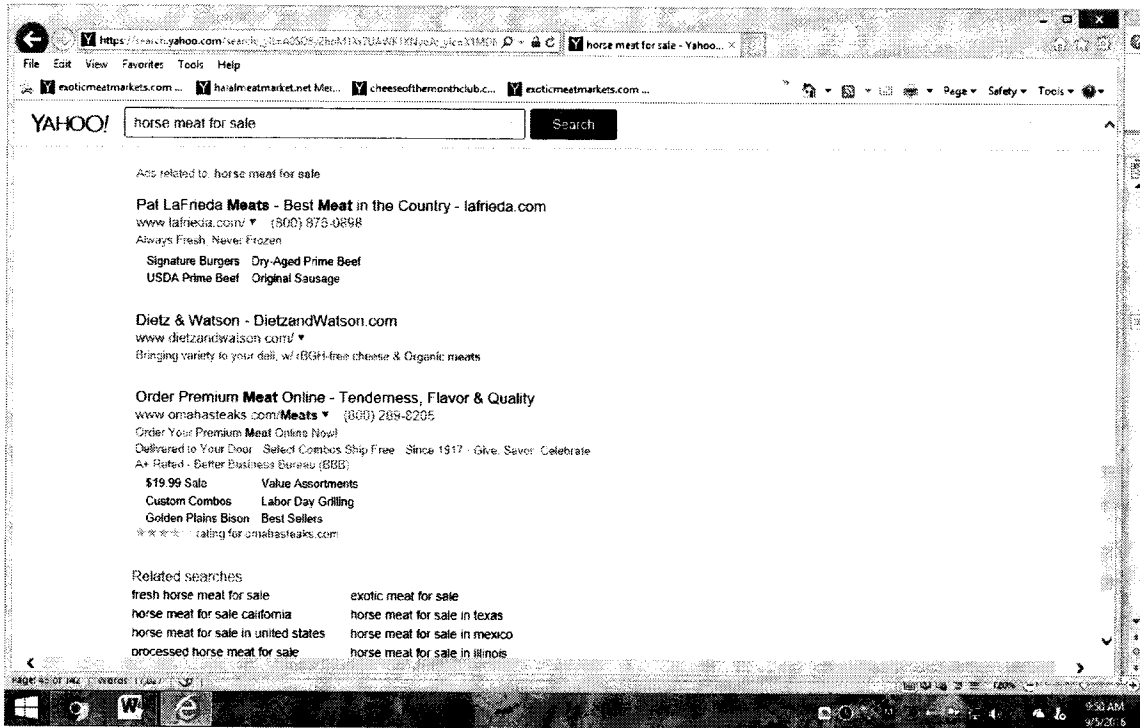




58. Horse Meat is illegal to sell in United States of America.

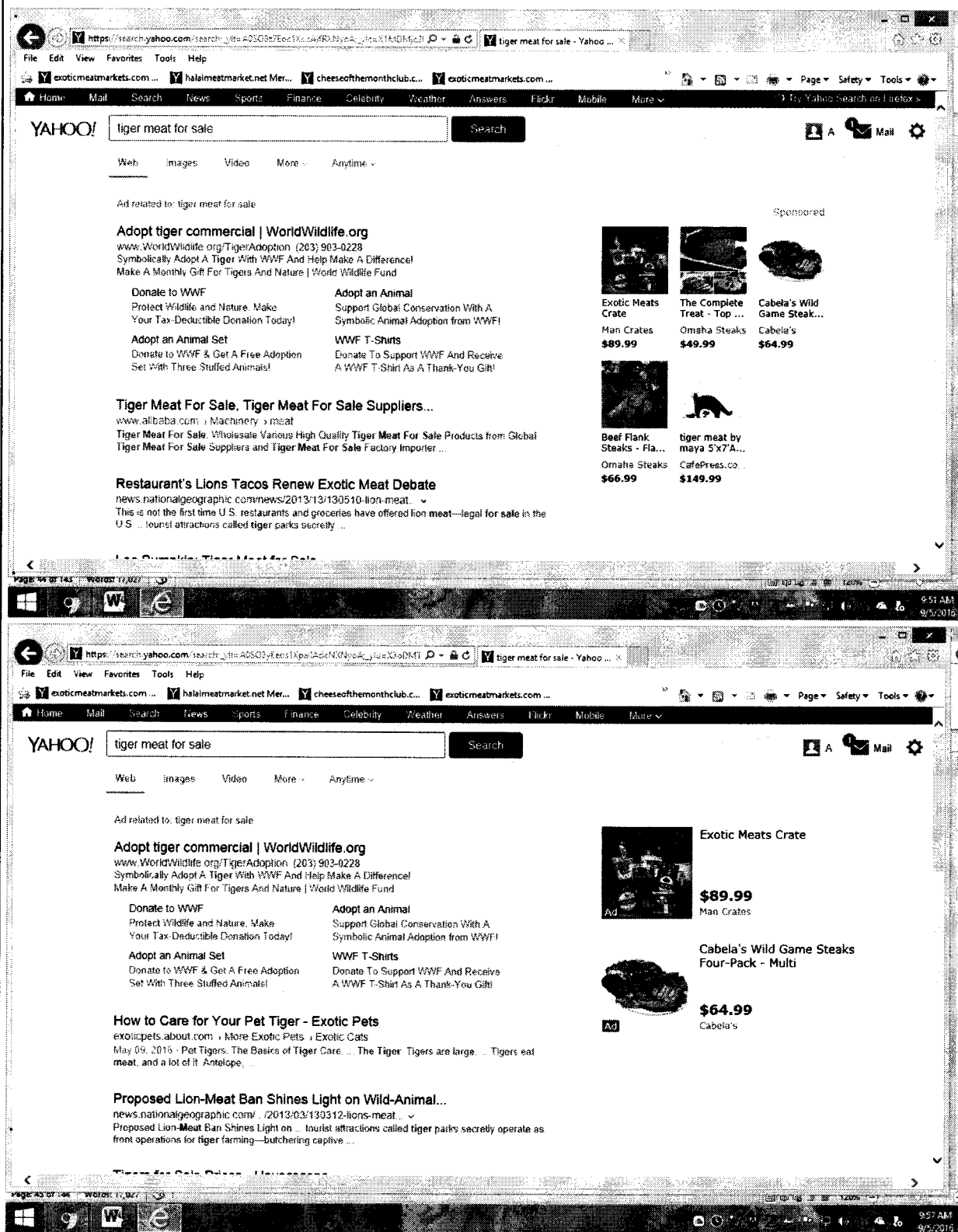
59. Defendant YAHOO claims that following advertisers bid for the KEY WORD "HORSE MEAT FOR SALE" on September 5, 2016.





60. Tiger Meat is illegal to sell in United States of America.

61. Defendant YAHOO claims that following advertisers bid for the KEY WORD "TIGER MEAT FOR SALE" on September 5, 2016.



62. Panda Meat is illegal to sell in United States of America.



63. Defendant YAHOO claims that following advertisers bid for the KEY WORD “PANDA MEAT FOR SALE” on September 5, 2016.

YAHOO!

Web Images Video More ... Anytime

Also try: fresh panda meat for sale

Ads related to: panda meat for sale

**Blue Apron - \$40 Off | blueapron.com**  
[www.blueapron.com](http://www.blueapron.com)  
 Premium meats, sustainable seafood & fresh produce delivered weekly  
 Blue Apron: Fresh Ingredients, Original Recipes, Delivered to You

**Try it Today**  
 Dinner is easy w/ Blue Apron's  
 fresh ingredients & recipes

**Shop the Market**  
 Our culinary team's hand-selected  
 kitchen essentials

**How it Works**  
 Fresh ingredients & great recipes  
 delivered weekly to your home

**Blue Apron Reviews**  
 The reviews are in! See what people  
 are saying about Blue Apron

**Meats Canned at Amazon - Free Shipping on Qualified Orders.**  
[www.Amazon.com/Grocery](http://www.Amazon.com/Grocery)  
 4.6 ★★★★★ rating for amazon.com  
 Free Shipping on Qualified Orders. Buy Groceries at Amazon & Save.  
**Ratings:** Customer Service 3.5/5 - Delivery 3.5/5 - Price 3.5/5

**Amazon Wine**  
 Beverages & Coffee  
 Gourmet Gifts

**Breakfast Foods**  
 Snack Food  
 Fresh Flowers

**Lee Kum Kee Panda Brand Broccoli Beef, 8 oz (Pack of 6)**  
**\$15.03**  
 Walmart

Ad

**Meat Sale On Sale**  
[meat-sale.BestSales.com](http://meat-sale.BestSales.com)  
 Meat Sale Up to 70% Off BestSales.com - Buy for  
 Less Today!

**Panda Bear Meat | wow.com**  
[wow.com/PandaBearMeat](http://wow.com/PandaBearMeat)  
 Search for Panda Bear Meat Look Up Quick Results  
 Now!

**100% Grass-Fed Bison**  
[www.grassfedtraditions.com](http://www.grassfedtraditions.com)  
 Produced by family farms with animals that graze on  
 pasture!

The screenshot shows a web browser window with the Yahoo! search engine. The search query is "panda meat for sale". The results page displays several advertisements. The first ad is for "Need Butcher Goods? | wholefoodsmarket.com", which promotes healthy eating and organic items. The second ad is for "Meats Canned at Amazon - Free Shipping on Qualified Orders.", highlighting free shipping on grocery orders. The third ad is for "Blue Apron - \$40 Off | blueapron.com", offering a discount on premium meats and fresh produce. The page also includes a "Search" button and a "panda meat for sale" search bar.

File Edit View Favorites Tools Help

Y panda meat for sale - Yahoo...

Y exoticmeatmarkets.com ... Y halalmeatmarket.net Mer... Y cheeseofthemonthclub.c... Y exoticmeatmarkets.com ...

YAHOO!

panda meat for sale

Search

Ads related to: panda meat for sale

**Need Butcher Goods? | wholefoodsmarket.com**  
 wholefoodsmarket.com/BetterLife  
 Healthy Eating & Healthy Living - Natural, Organic, Sustainable Items

**Meats Canned at Amazon - Free Shipping on Qualified Orders.**  
 www.amazon.com/Grocery  
 4.8 ★★★★★ rating for amazon.com  
 Free Shipping on Qualified Orders. Buy Groceries at Amazon & Save.  
**Ratings:** Customer Service 3.5/5 • Delivery 3.6/5 • Price 3.6/5

Amazon Wine	Breakfast Foods
Beverages & Coffee	Snack Food
Gourmet Gifts	Fresh Flowers

**Blue Apron - \$40 Off | blueapron.com**  
 www.blueapron.com  
 Premium meats, sustainable seafood & fresh produce delivered weekly.

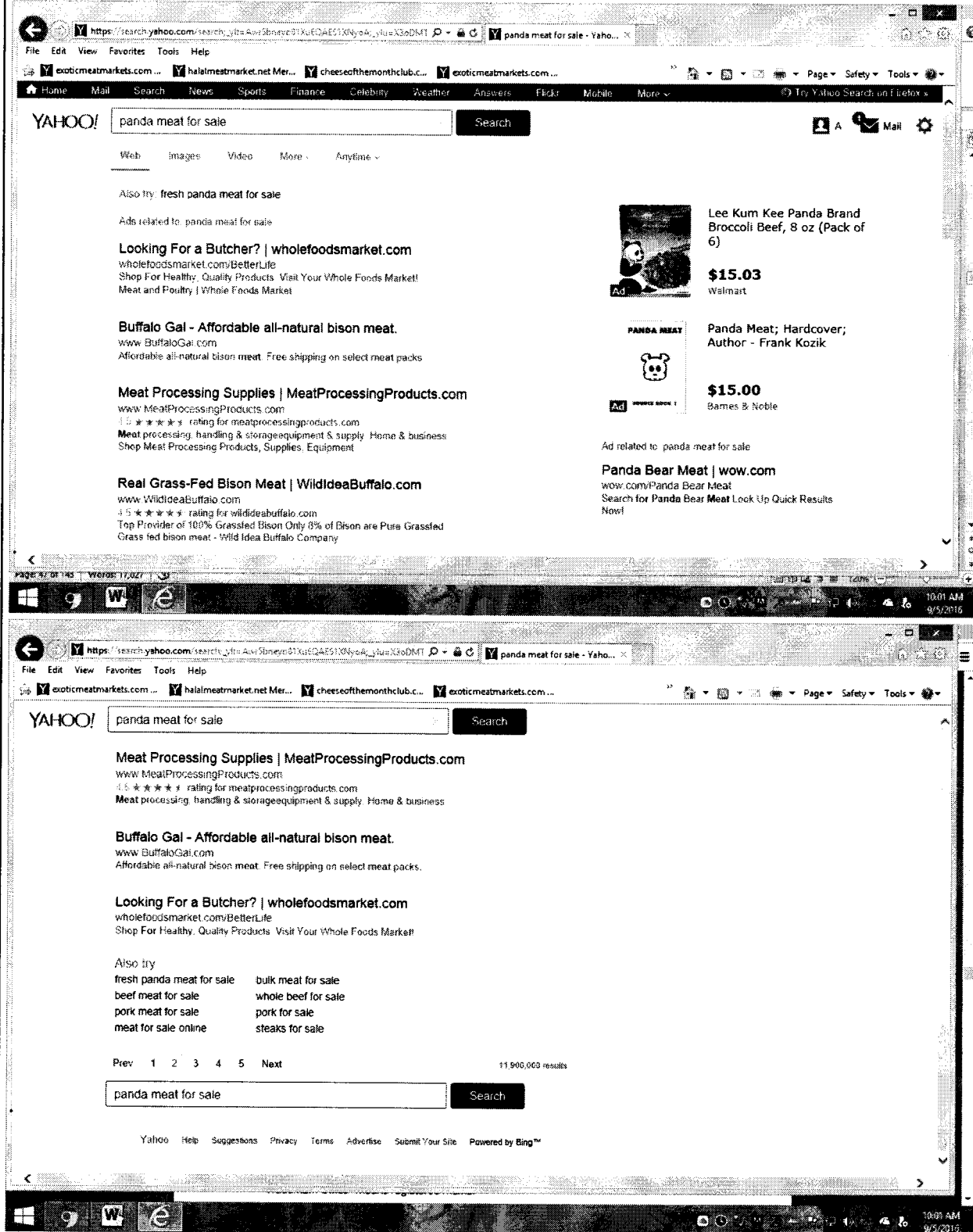
Try it Today	How It Works
Shop the Market	Blue Apron Reviews

Also try

fresh panda meat for sale	bulk meat for sale
beef meat for sale	whole beef for sale
pork meat for sale	pork for sale
meat for sale online	steaks for sale

Page: 46 of 145 Words: 1,021

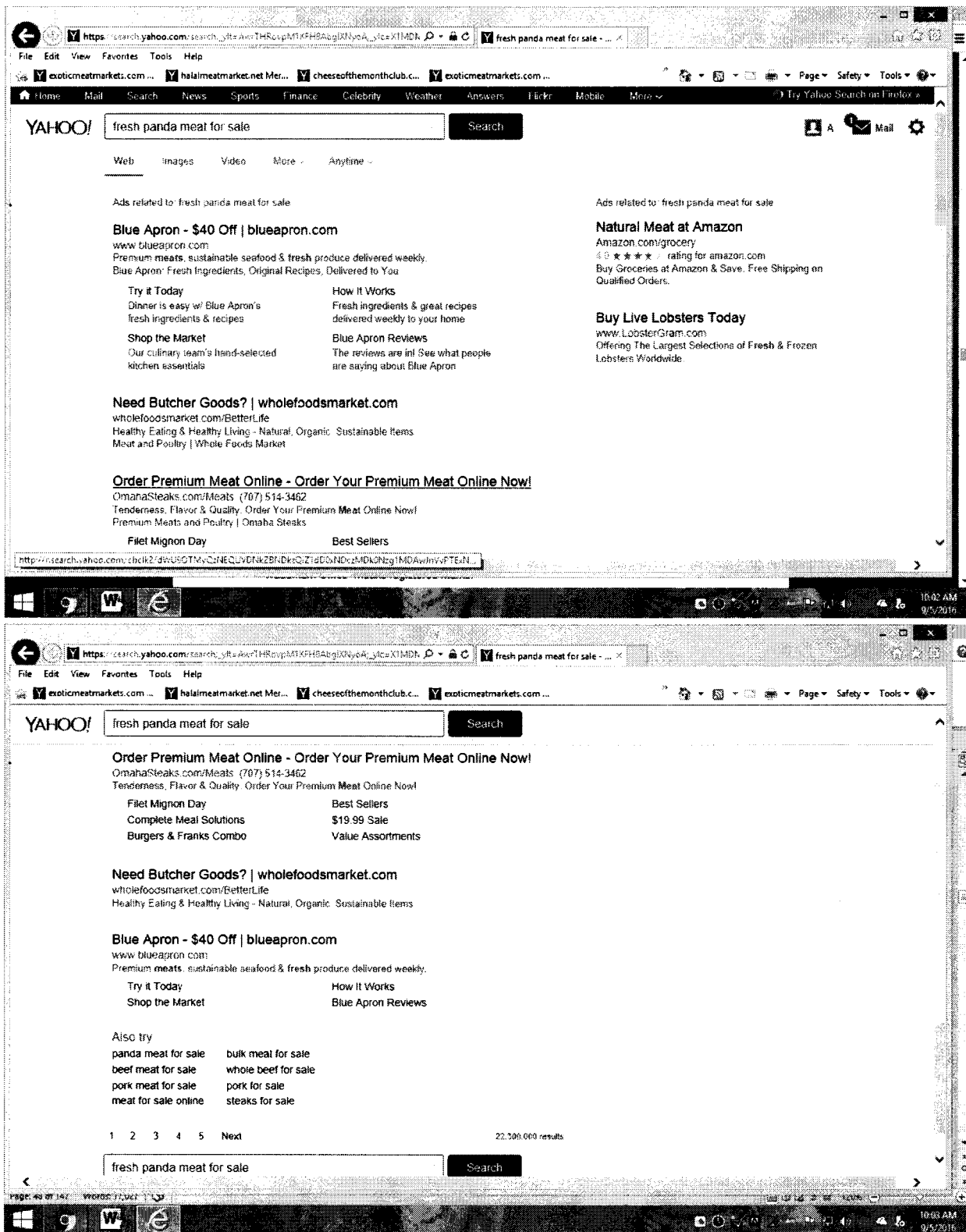
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64. Panda Meat is illegal to sell in United States of America.



65. Defendant YAHOO claims that following advertisers bid for the KEY WORD "FRESH PANDA MEAT FOR SALE" on September 5, 2016.





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EXOTIC MEAT MARKET - A...

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Ads related to EXOTIC MEAT MARKET

**Exotic Meat Market - Exotic Meat Market from \$14.**  
http://www.groupon.com  
Exotic Meat Market from \$14. Save 50% Today  
50% Off Exotic Meat Market - Grand Terrace, CA | Groupon  
groupon.com is rated 4.5 stars (177 reviews)  
70% Off Restaurant Deals Best Online Coupons  
Electronics, Goods & More Exclusive Travel Deals  
Fun Things to Do Relax with Spa Deals

**Lobel's® of New York | Lobels.com**  
www.Lobels.com  
Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door.  
USDA Prime Filet Mignon Lamb Chops, Roasts & More  
All-Natural Wagyu Beef USDA Prime Beef Burgers  
Grilling Packages Lobel's Authentic BBQ

**Buffalo Gal - Bison Meat - Affordable Grass Fed Bison Meat**  
www.buffalogal.com  
Affordable Grass Fed Bison Meat. Free Shipping on Meat Gift Packs!  
Specials - Bison Burger - Free Shipping - Bison Steaks

Searches related to EXOTIC MEAT MARKET

<a href="#">Exotic Meat Market California</a>	<a href="#">Exotic Meats for Sale</a>
<a href="#">Exotic Meat Market San Antonio</a>	<a href="#">Bear Meat for Sale</a>
<a href="#">Exotic Meat Market Houston</a>	<a href="#">Exotic Meats San Antonio</a>
<a href="#">Exotic Meat Market Denver</a>	<a href="#">Bear Jerky for Sale</a>

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YAHOO! exotic meat market Search

Ads related to: exotic meat market

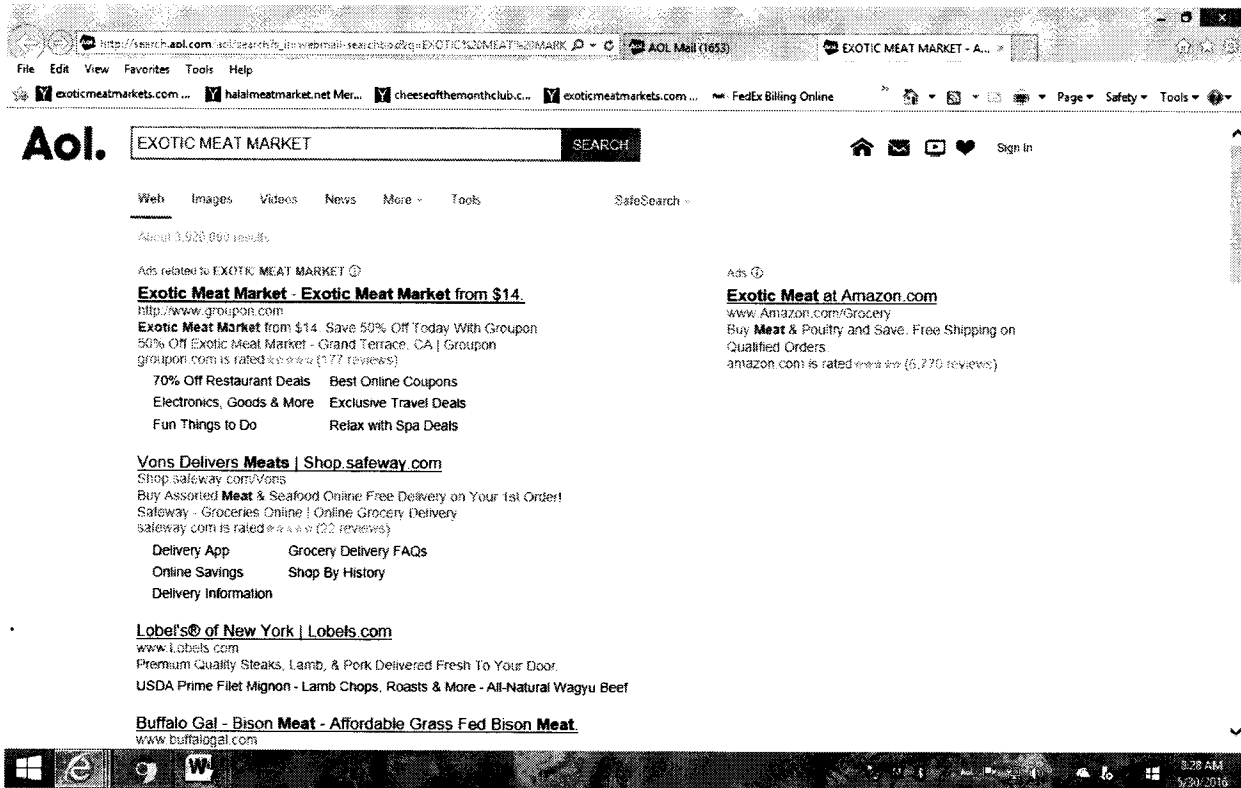
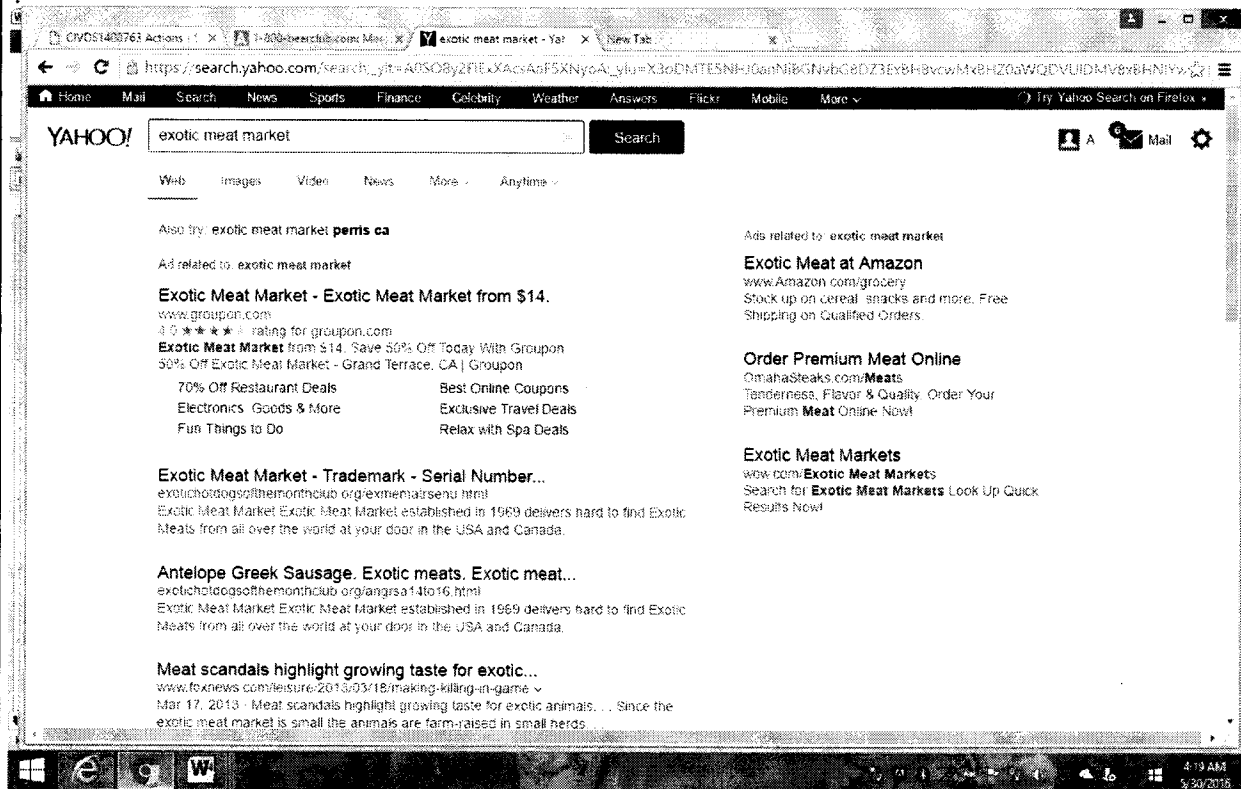
**100% Grass-fed Bison Meat | GrassfedTraditions.com**  
GrassfedTraditions.com  
100% Grass-fed and grass-finished. Restaurant quality delivered to you.  
Special Deals & Giveaways This Week's Sales  
Organic Soy-Free Chicken Grass-Fed Butter  
Soy-Free Eggs

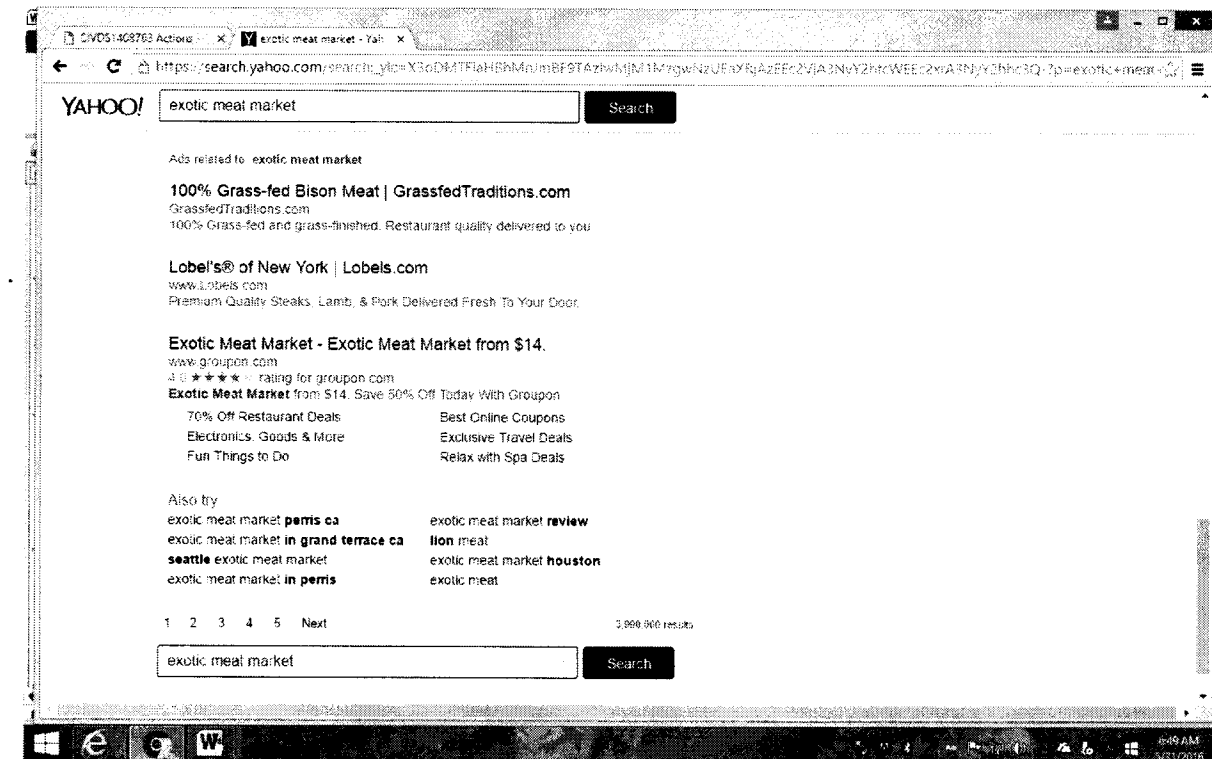
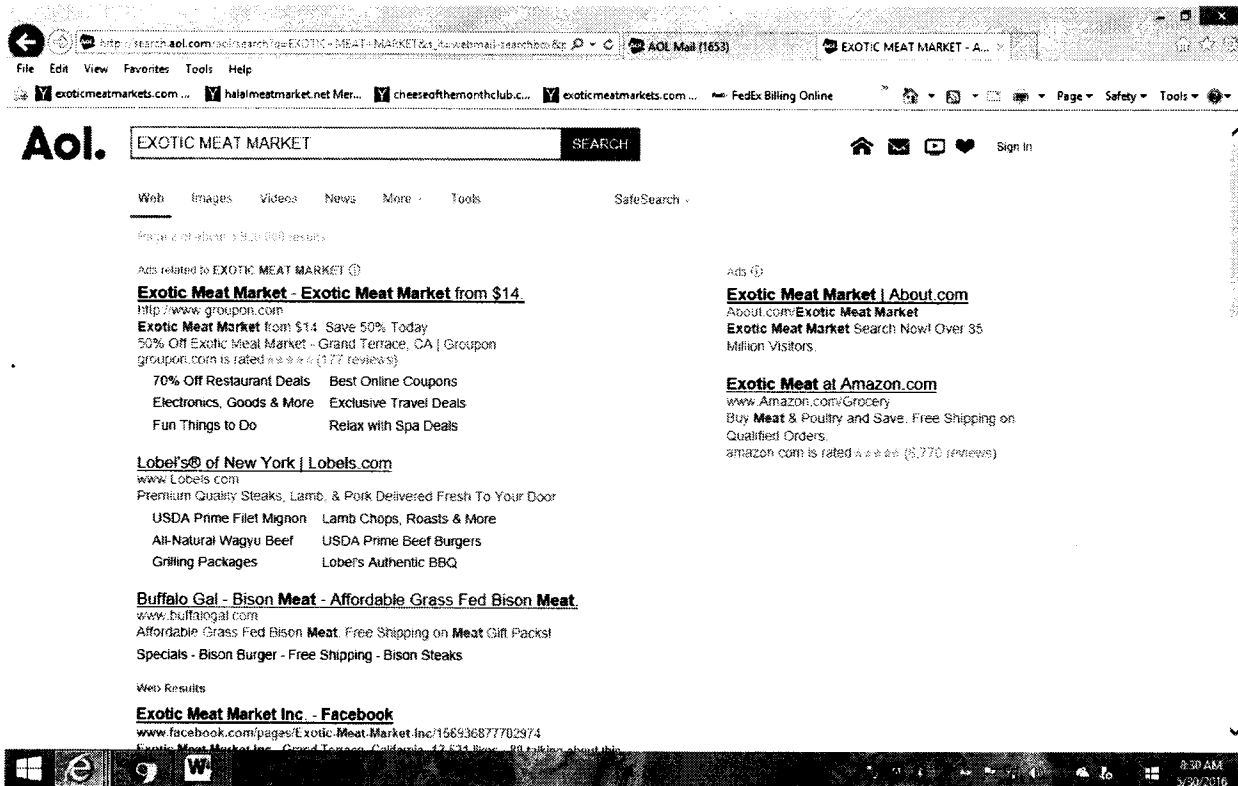
**Lobel's® of New York | Lobels.com**  
www.Lobels.com  
Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door.  
USDA Prime Filet Mignon Lamb Chops, Roasts & More  
All-Natural Wagyu Beef USDA Prime Beef Burgers  
Grilling Packages Lobel's Authentic BBQ

**Exotic Meat Market - Exotic Meat Market from \$14.**  
www.groupon.com  
4.5 stars rating for groupon.com  
Exotic Meat Market from \$14. Save 50% Off Today With Groupon  
70% Off Restaurant Deals Best Online Coupons  
Electronics, Goods & More Exclusive Travel Deals  
Fun Things to Do Relax with Spa Deals

Also try  
exotic meat market **peris ca** exotic meat market **review**  
exotic meat market **in grand terrace ca** lion meat  
**seattle** exotic meat market exotic meat market **houston**

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**Exotic Meat Market - Exotic Meat Market from \$14.**  
Ad: <http://www.groupon.com> Groupon  
Exotic Meat Market from \$14. Save 55% Off Today With Groupon  
Kobe Steak Burgers or Camel Meat Burgers at Exotic Meat Market ...  
groupon.com has been visited by 180K+ users in the past month  
Hiscox or DUBOKI Deals. Find Deals Near You: Local, Goods & Services  
50% Off Exotic Meat Market - Grand Terrace, CA | Groupon  
groupon.com is rated ★★★★★ (177 reviews)  
Better Business Bureau Rated A+ in 2015  
70% Off Restaurant Deals Best Online Coupons Electronics, Goods & More

**Wild Idea Buffalo Co. SD - Official Home.**  
Ad: [www.wildideabuffalo.com](http://www.wildideabuffalo.com) 1,350+ followers on Twitter  
Official Home. Top Provider of 100% Grass-fed, Free-roaming Bison Meat  
Our buffalo tastes better because they are raised better!

**Lobel's® of New York | Lobels.com**  
Ad: [www.Lobels.com](http://www.Lobels.com)  
Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door.

**Exotic Meats USA**  
[www.exoticmeatsandmore.com](http://www.exoticmeatsandmore.com) ✓  
Online shopping for purchase of Exotic Meats from a great selection of Gourmet food,  
organic farm raised heart healthy lean meats and are highly recommended for ...  
Samplers Alligator Snake Camel Kangaroo Turtle

**Exotic Meat Market**  
Directions Website  
Address: 130 W Walnut Ave Ste A18, Perris, CA 92571  
Phone: (951) 345-4623  
Price: \$\$\$  
Open today 8:00 AM - 5:00 PM  
Reviews ★★★★★ Yelp (23)  
yelp: Recent Favorable Critical  
★★★★★ May 19, 2015

Windows Taskbar: 6:19 AM 5/31/2016

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YAHOO! exotic meat market Search Exotic M... Mail

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Also try: exotic meat market **perris ca**

**Wild Game - Dorfner's Meats**  
[www.dorfnersmeats.com/butcher-shop/wild-game](http://www.dorfnersmeats.com/butcher-shop/wild-game) ✓  
Dorfner's Meat Market Offers the Finest in Exotic Meats and Wild Game! Your family will appreciate you for making the healthy choice to incorporate all natural ...

**Bizzare Foods, Exotic meats, Exotic meat market, ...**  
[exoticfoodsofthemonthclub.info/bizzarefoods.html](http://exoticfoodsofthemonthclub.info/bizzarefoods.html)  
Exotic Meat Market offers Bizzare Foods, some of the most unique and unusual food available in America. America has developed its reputation as a melting pot of ...

**Exotic Jerky | Mountain America Jerky**  
[mountainamericajerky.com/products/exotic-jerky](http://mountainamericajerky.com/products/exotic-jerky) ✓  
A collection of specialty exotic meat jerky from around the world. All of our Exotic Jerky is hand-cut with no fillers, MSG or nitrates.

**Exotic Meats - Village Meat and Wine**  
[villagemeatandwine.com/exotic-meats](http://villagemeatandwine.com/exotic-meats) ✓  
Village Meat and Wine Voted #1 Gourmet Meat Market By Las Vegas Life Magazine. Home, Exotic Meats Recipes: ... All of our Kobe Beef and Exotic Meats are supplied by ...

**Strip District Meats » Exotic Meats**  
[stripdistrictmeats.com/exotic-meats](http://stripdistrictmeats.com/exotic-meats) ✓  
Exotic Meats. Besides the traditional meats you get at Strip District Meats, we have a large selection of EXOTICS, including Kangaroo, Elk, Buffalo, ...

Ads related to: exotic meat market

**Exotic Meat Market**  
[www.groupon.com](http://www.groupon.com)  
4.0 ★★★★★ rating for groupon.com  
Exotic Meat Market from \$14. Save 50% Off Today With Groupon

**Bison Steak at Amazon.com**  
[www.amazon.com/Grocery](http://www.amazon.com/Grocery)  
4.0 ★★★★★ rating for amazon.com  
Free Shipping on Qualified Orders. Buy Groceries at Amazon & Save.

**Order Premium Meat Online**  
[OmahaSteaks.com/Meats](http://OmahaSteaks.com/Meats)  
Tenderness, Flavor & Quality. Order Your Premium Meat Online Now!

**Meat Deals | Lobels.com**  
[www.Lobels.com](http://www.Lobels.com)  
Premium Beef, Pork, Lamb, and More from NY's Famed Online Meat Shop

Windows Taskbar: 5:42 PM 5/31/2016



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Also try: **exotic meat market perris ca**

Ads related to: **exotic meat market**

**Exotic Meat Market - Exotic Meat Market from \$14.**  
www.groupon.com  
4.9 ★★★★★ rating for groupon.com  
Exotic Meat Market from \$14. Save 56% Off Today With Groupon  
50% Off Exotic Meat Market - Grand Terrace, CA | Groupon  
70% Off Restaurant Deals      Best Online Coupons  
Electronics, Goods & More      Exclusive Travel Deals  
Fun Things to Do      Relax with Spa Deals

**Vons Delivers Meats | Shop.safeway.com**  
Shop.safeway.com/Vons  
4.9 ★★★★★ rating for safeway.com  
Buy Assorted Meat & Seafood Online Free Delivery on Your 1st Order!  
Safeway - Groceries Online | Online Grocery Delivery  
Delivery App      Grocery Delivery FAQs  
Online Savings      Shop By History  
Delivery Information

**Exotic - Discount Meat Market**  
8kdiscountmeats.com/onlinestore/index.php?main\_page=...  
Welcome to T & K's Discount Meats! - Exotic - Chicken Pork Beef Seafood Daily Specials Exotic  
Turkey e-commerce, open source, shop, online shopping

Ads related to: **exotic meat market**

**Exotic Meat at Amazon**  
www.Amazon.com/grocery  
Stock up on cereal, snacks and more. Free Shipping  
on Qualified Orders.

**Meat Deals | Lobels.com**  
www.Lobels.com  
Premium Beef, Pork, Lamb, and More from NY's  
Famed Online Meat Shop.

**Bison Steaks | Alhea.com**  
Alhea.com/Bison Steaks  
Find Bison Steaks Now. Multiple Search Engines at  
Once!

**News on Findarticles**  
FindArticles.com/Find-Articles  
Here Get Great Articles Now. Find Articles &  
Shopping Results!

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Ads related to: **exotic meat market**

**Order Premium Meat Online**  
OmahaSteaks.com/Meats (317) 474-5253  
Tenderness, Flavor & Quality. Order Your Premium Meat Online Now!

**Bison Steak at Amazon.com**  
www.Amazon.com/Grocery  
4.9 ★★★★★ rating for amazon.com  
Free Shipping on Qualified Orders. Buy Groceries at Amazon & Save.

**Exotic Meat Market**  
www.groupon.com  
4.9 ★★★★★ rating for groupon.com  
Exotic Meat Market from \$14. Save 56% Off Today With Groupon

Also try

exotic meat market perris ca	exotic meat market review
exotic meat market in grand terrace ca	lion meat
seattle exotic meat market	exotic meat market houston
exotic meat market in perris	exotic meat

Prev 5 6 7 8 9 Next      242 results

exotic meat market      Search

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Also try: **exotic meat market perris ca**

**Wild Game - Dorfler's Meats**  
www.dorflersmeats.com/butcher-shop/wild-game  
Dorfler's Meat Market Offers the Finest in Exotic Meats and Wild Game! Your family will appreciate you for making the healthy choice to incorporate all natural...

**Bizzare Foods, Exotic meats, Exotic meat market, ...**  
exoticdogsofthemonthclub.info/bizzarefoods.html  
Exotic Meat Market offers Bizzare Foods, some of the most unique and unusual food available in America. America has developed its reputation as a melting pot of...

**Exotic Jerky | Mountain America Jerky**  
mountainamericajerky.com/products/exotic-jerky...  
A collection of specialty exotic meat jerky from around the world. All of our Exotic Jerky is hand-cut with no fillers, MSG or nitrates.

**Exotic Meats - Village Meat and Wine**  
villagemeatandwine.com/exotic-meats  
Village Meat and Wine Voted #1 Gourmet Meat Market By Las Vegas Life Magazine. Home, Exotic Meats, Recipes: ... All of our Kobe Beef and Exotic Meats are supplied by...

**Strip District Meats » Exotic Meats**  
stripdistrictmeats.com/exotic-meats  
Exotic Meats. Besides the traditional meats you get at Strip District Meats, we have a large selection of EXOTICS, including Kangaroo, Elk, Buffalo...

Ads related to: **exotic meat market**

**Exotic Meat Market**  
www.groupon.com  
4.8 ★★★★★ rating for groupon.com  
**Exotic Meat Market** from \$14. Save 50% Off Today With Groupon

**Bison Steak at Amazon.com**  
www.amazon.com/Grocery  
4.0 ★★★★★ rating for amazon.com  
Free Shipping on Qualified Orders. Buy Groceries at Amazon & Save.

**Order Premium Meat Online**  
OmahaSteaks.com/Meats  
Tenderness, Flavor & Quality. Order Your Premium Meat Online Now!

**Meat Deals | Lobels.com**  
www.Lobels.com  
Premium Beef, Pork, Lamb, and More from NY's Famed Online Meat Shop

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Also try: **exotic meat market perris ca**

Ads related to: **exotic meat market**

**Exotic Meat Market - Exotic Meat Market from \$14.**  
www.groupon.com  
4.8 ★★★★★ rating for groupon.com  
**Exotic Meat Market** from \$14. Save 50% Off Today With Groupon  
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70% Off Restaurant Deals  
Electronics, Goods & More  
Fun Things to Do

Best Online Coupons  
Exclusive Travel Deals  
Relax with Spa Deals

**Huntington Meats - Farmer's Market**  
huntingtonmeats.com  
The Huntington Meats, located at Farmer's Market in Los Angeles, CA. A quality meat shop featuring Harris Ranch Beef, and homemade sausages made fresh daily.

**GAME AND EXOTIC ITEMS - New York Wholesale Meat ...**  
mainstreetmeats.com/wholesale/products/game-and-ex...  
We specialize in the highest quality meats and poultry products. We carry over 3,000 items and can handle custom specifications for any order.

**The Stock Market**  
stockmarketinc.com  
Concord's #1 Meat Market... The Stock Market © 2016; All Rights Reserved

Ads related to: **exotic meat market**

**100% Grass-fed Bison Meat**  
GrassfedTraditions.com  
100% Grass-fed and grass-finished Restaurant quality delivered to you

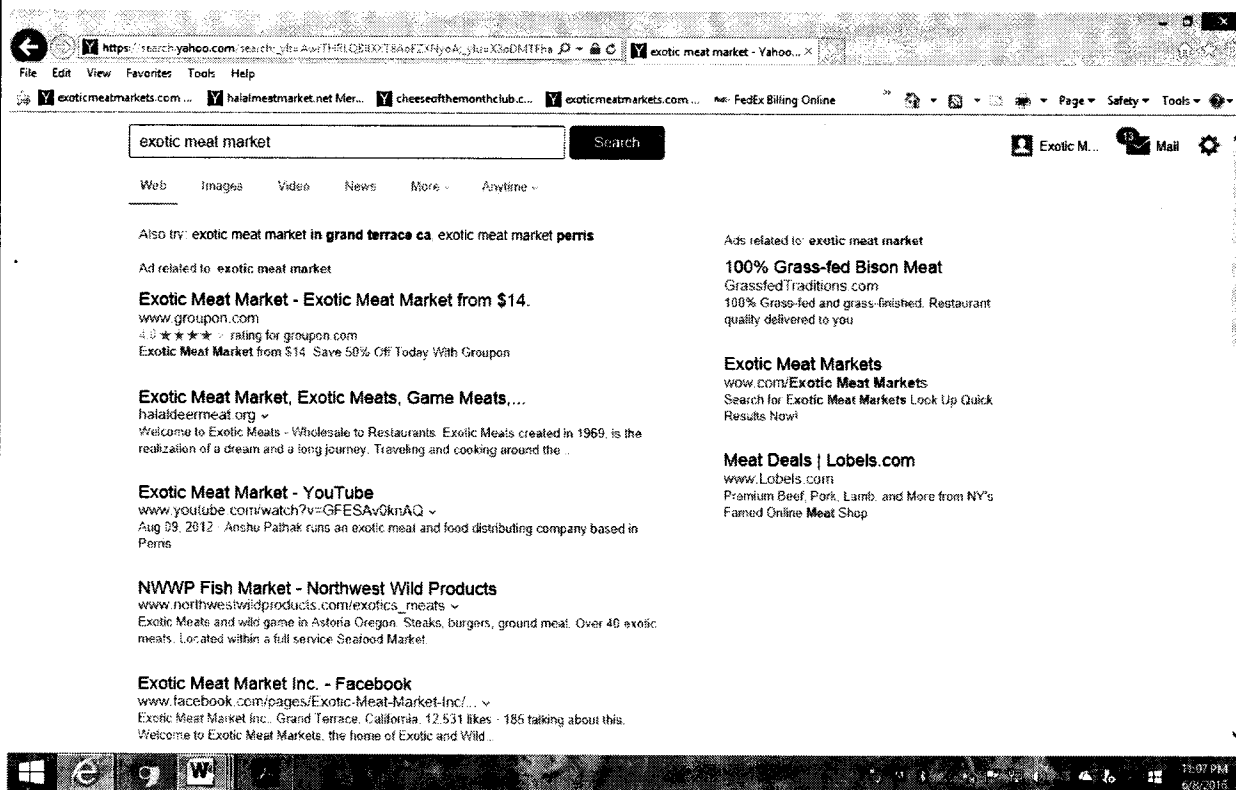
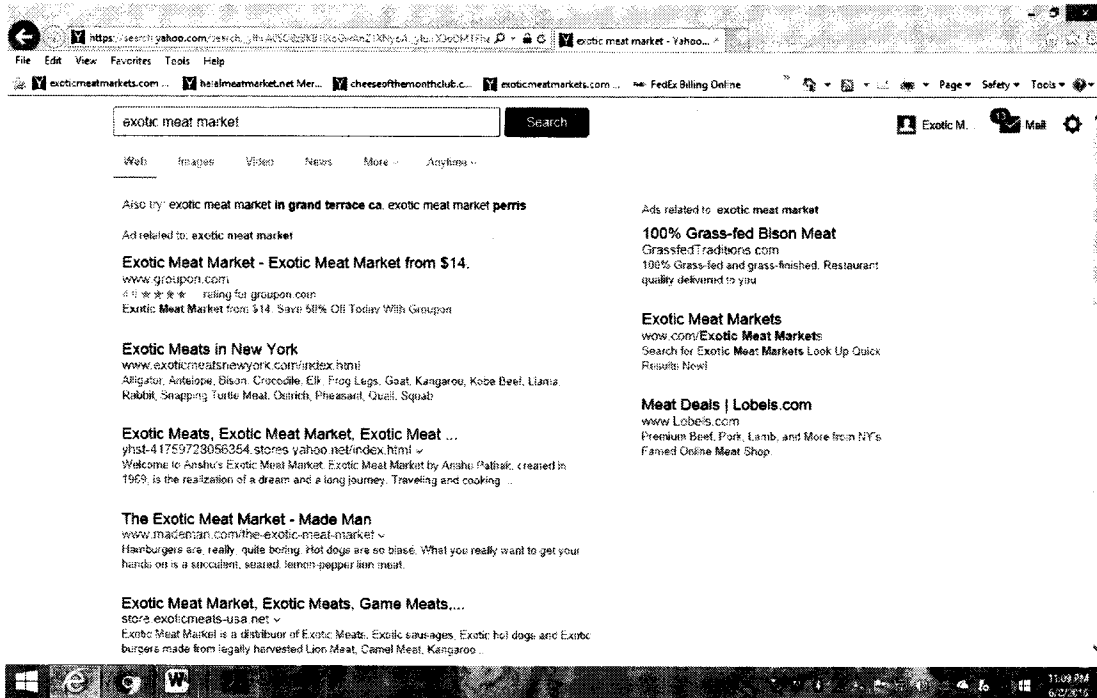
**Beef Jerky Gifts Shipped**  
mancrates.com/beef-jerky-gifts  
4.5 ★★★★★ rating for mancrates.com  
No bones, no ribbons, no fluff. Awesome beef jerky gifts for men

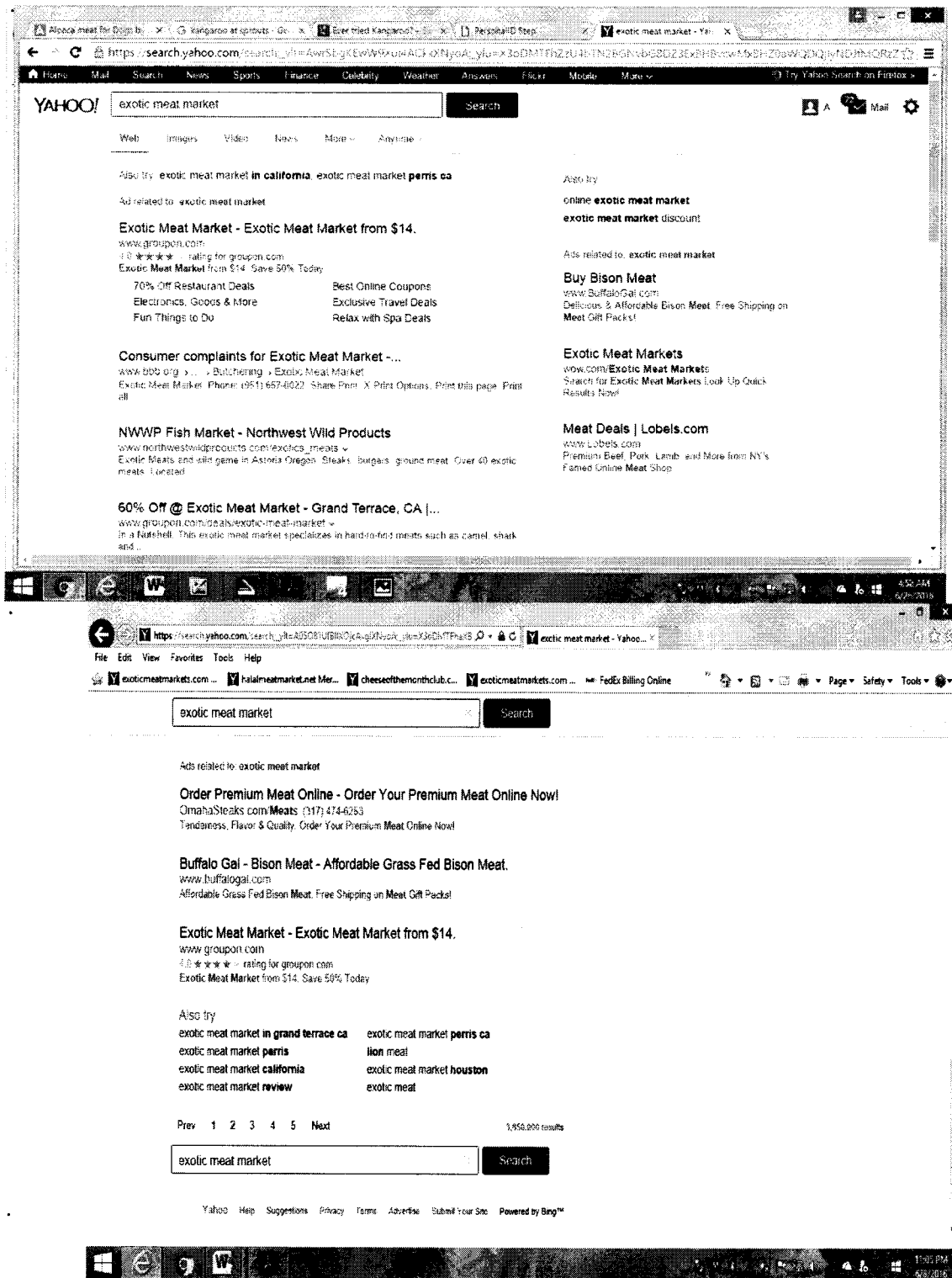
**Meat Deals | Lobels.com**  
www.Lobels.com  
Premium Beef, Pork, Lamb, and More from NY's Famed Online Meat Shop.

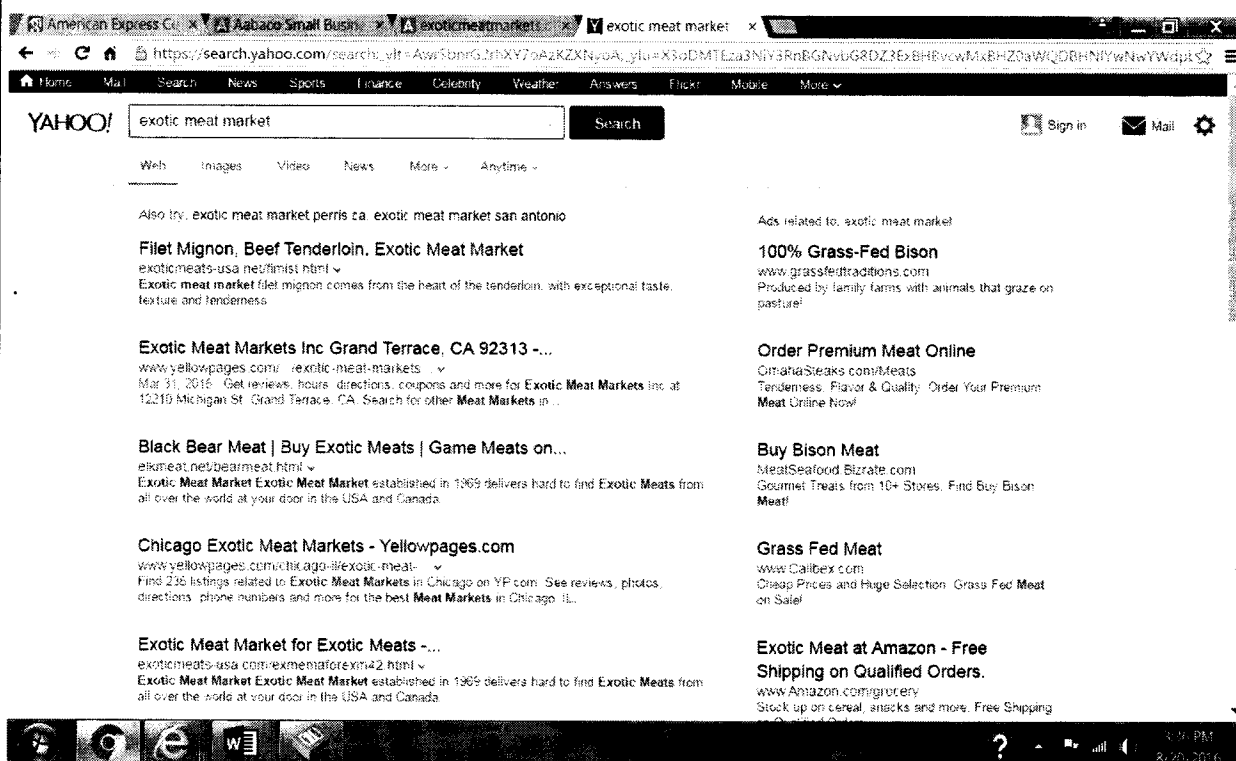
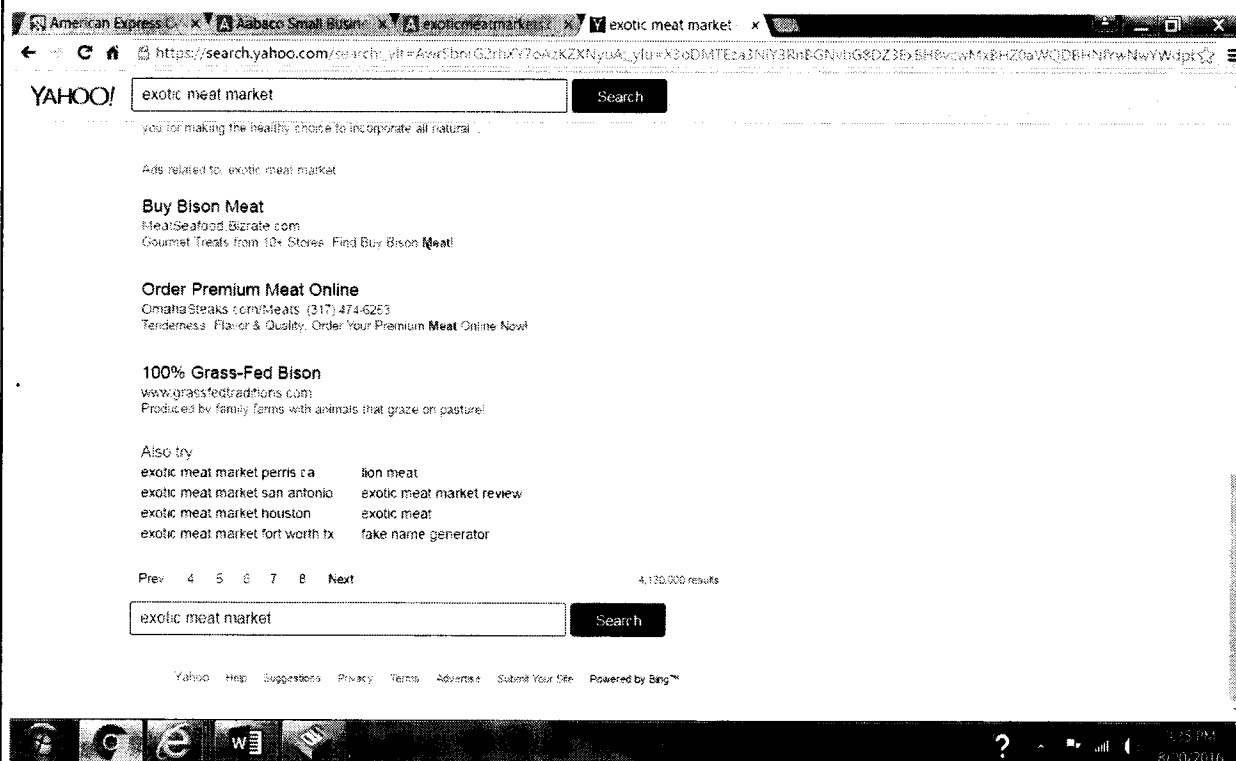
**Exotic Meat at Amazon**  
www.amazon.com/grocery  
Stock up on cereal, snacks and more. Free Shipping on Qualified Orders.

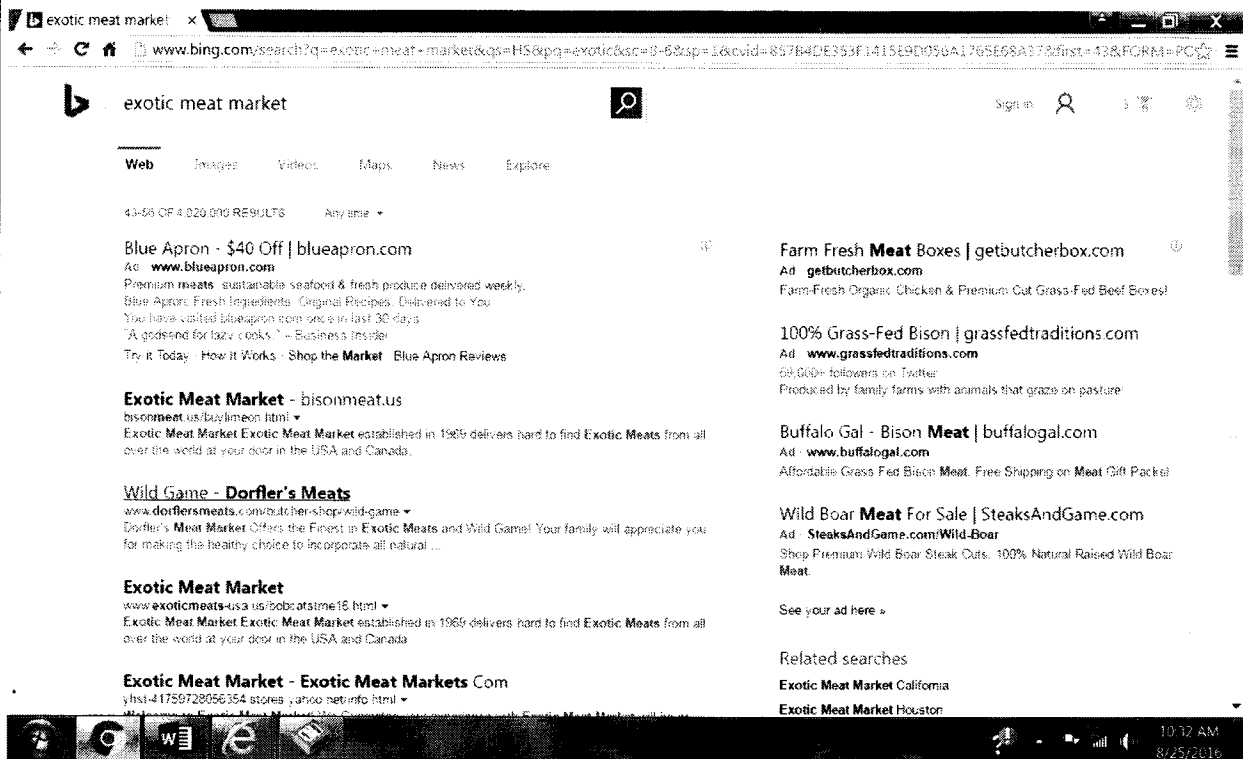
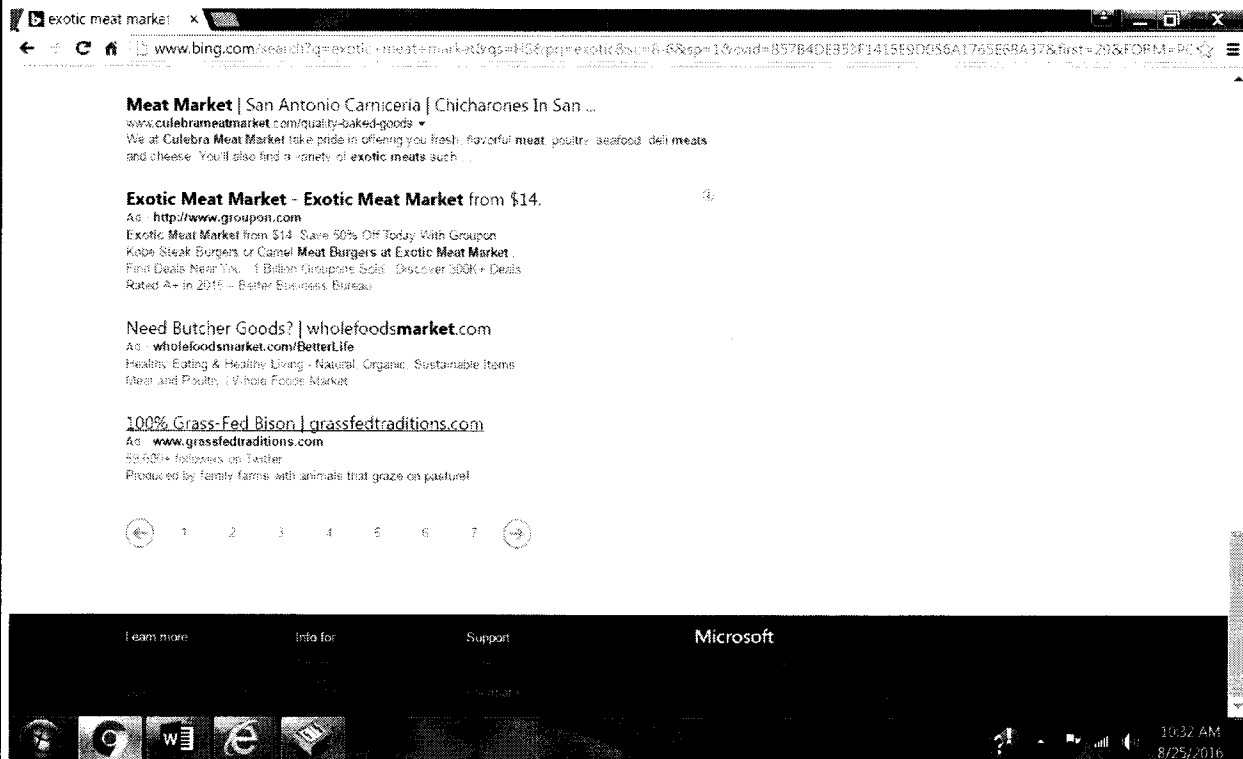
**Bison Steaks - Multiple Search Engines at Oncl**  
Alhea.com/Bison Steaks  
Find Bison Steaks Now. Multiple Search Engines at

Windows taskbar: 8:39 PM 8/2/2016











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The screenshot shows a Yahoo! search results page for the query 'exotic meat market'. The browser's address bar shows the search URL. The page includes navigation links like Home, Mail, Search, News, Sports, Finance, Celebrity, Weather, Answers, Flickr, Mobile, and More. The search results are categorized into 'Web', 'Images', 'Video', 'News', 'More', and 'Anytime'. The 'Web' results are listed on the left, and 'Ads related to: exotic meat market' are on the right.

**Web**   Images   Video   News   More   Anytime

Ads related to: **exotic meat market**

**Exotic Meat Market -groupon.com**  
[www.groupon.com/](http://www.groupon.com/) ▼  
 Exotic Meat Market from \$14. Save 50% Off Today With Groupon  
 Discover 300K+ Deals · Find Deals Near You  
 Rated A+ in 2015 - Better Business Bureau  
 Spas & Massages   70% Off Restaurant Deals  
 Exclusive Travel Deals   Fun Things to Do

**Rabbit n Rattlesnake Ssg - A Sausage with a Bite - smgfoods.com**  
[www.smgfoods.com/](http://www.smgfoods.com/) ▼ (800) 310-2360  
 \$16.95/Pkg. of 4 @ 4 oz Sausages

**Tender Alligator Meat - Find Quality Farm Alligator Meat Here**  
[www.cajungrocer.com/AlligatorMeat](http://www.cajungrocer.com/AlligatorMeat) ▼  
 Visit Us To Order Online Now!  
 4,000 Bizrate Reviews · Try our Premium Crawfish · Over 2,000 Cajun products

Ads related to: **exotic meat market**

**Pat LaFrieda Meats**  
[www.lafrieda.com/](http://www.lafrieda.com/)  
 ▼ (800) 876-0898  
 Best Meat in the Country. Always Fresh, Never Frozen.  
 Signature Burgers   Dry-Aged Prime Beef  
 USDA Prime   Original Sausage

**Sale Meats**  
[www.target.com/](http://www.target.com/) ▼  
 The Weekly Ad is Here. See This Week's Featured Grocery Sales  
 27100 Eucalyptus Ave, Moreno Valley, CA

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This screenshot shows the continuation of the Yahoo! search results page. The 'Web' results are still visible, and a 'Related searches' section has appeared at the bottom. The browser's address bar and navigation links are consistent with the previous screenshot.

**Rabbit n Rattlesnake Ssg - A Sausage with a Bite - smgfoods.com**  
[www.smgfoods.com/](http://www.smgfoods.com/) ▼ (800) 310-2360  
 \$16.95/Pkg. of 4 @ 4 oz Sausages

**Tender Alligator Meat - Find Quality Farm Alligator Meat Here**  
[www.cajungrocer.com/AlligatorMeat](http://www.cajungrocer.com/AlligatorMeat) ▼  
 Visit Us To Order Online Now!  
 4,000 Bizrate Reviews · Try our Premium Crawfish · Over 2,000 Cajun products  
 Alligator Boudin   Turduckens  
 Drago's Grilled Oysters   Gulf Shrimp  
 \*\*\*\* rating for cajungrocer.com

**Related searches**

exotic meat market perris ca	lion meat
exotic meat market in grand terrace ca	exotic meat market houston
exotic meat market los angeles	exotic meat market review
exotic meat market california	exotic meat market san antonio

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exotic meat market   Search

exotic meat market

www.bing.com/search?q=exotic+meat+market&qs=H5&pq=exotic&sc=8-8&sp=1&cid=85784DE353F1415E9D056A1765E68A37&first=29&FORM=PC

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29-42 OF 4 020,000 RESULTS Any time

**Exotic Meat Market - Exotic Meat Market from \$14.**  
Ad - <http://www.groupon.com>  
Exotic Meat Market from \$14. Save 50% Off Today With Groupon  
Kobe Steak Burgers or Camel Meat Burgers at Exotic Meat Market ...  
Find Great Deals You - 1 Billion Groupons Sold - Discover 300K+ Deals  
Rated A+ in 2015 - Better Business Bureau

**Real Grass-Fed Bison Meat**  
Ad - [www.WildIdeaBuffalo.com](http://www.WildIdeaBuffalo.com)  
Top Provider of 100% Grassfed Bison Only 8% of Bison are Pure  
Grassfed  
Grass fed bison meat - Wild Idea Buffalo Company

**Need Butcher Goods? | wholefoodsmarket.com**  
Ad - [wholefoodsmarket.com/BetterLife](http://wholefoodsmarket.com/BetterLife)  
Healthy Eating & Healthy Living - Natural, Organic, Sustainable Items  
Meat and Poultry | Whole Foods Market

**100% Grass-Fed Bison | grassfedtraditions.com**  
Ad - [www.grassfedtraditions.com](http://www.grassfedtraditions.com)  
66,600+ followers on Twitter  
Produced by family farms with animals that graze on pasture!

**Exotic Meat Market - YouTube**  
Ad - [www.youtube.com/watch?v=GFESAv0krvAQ](http://www.youtube.com/watch?v=GFESAv0krvAQ)  
BY THE PRESS-ENTERPRISE 19K VIEWS  
Aug 10, 2012 - Anshu Pathak runs an exotic meat and food distributing  
company based in Paris

**Buy Hippopotamus Meat from Exotic Meat Market**  
[www.wildideabuffalomeat.com/home.html](http://www.wildideabuffalomeat.com/home.html)

**Farm Fresh Meat Boxes | getbutcherbox.com**  
Ad - [getbutcherbox.com](http://getbutcherbox.com)  
Farm-Fresh Organic Chicken & Premium Cut Grass-Fed Beef Boxes!

**Buffalo Gal - Bison Meat | buffalogal.com**  
Ad - [www.buffalogal.com](http://www.buffalogal.com)  
Affordable Grass Fed Bison Meat. Free Shipping on Meat Gift Pack!

**Wild Boar Meat For Sale | SteaksAndGame.com**  
Ad - [SteaksAndGame.com/Wild-Boar](http://SteaksAndGame.com/Wild-Boar)  
Shop Premium Wild Boar Steak Cuts. 100% Natural Raised Wild Boar  
Meat.

**Exotic Meat at Amazon.com**  
Ad - [www.Amazon.com/Grocery](http://www.Amazon.com/Grocery)  
Buy Meat & Poultry and Save. Free Shipping on Qualified Orders  
Categories: Books, Movies, Electronics, Clothing, Toys and more

10:01 AM  
8/25/2016

1 exotic meat market! x

2 www.bing.com/search?q=exotic+meat+market&qs=H5&sp=exotic&sc=0-6&sp=1&vid=857B4DE353F1415E9D056A1765E68A37&first=15&FORM=PC

3 exotic meat market

4 Web Images Videos Maps News Explore

5 15/26 OF 4,030,000 RESULTS Any time

6 Consumer complaints for **Exotic Meat Market** - Central ...  
 www.bbb.org ... Butchering > **Exotic Meat Market** >  
 Exotic Meat Market, Phone: (951) 657-0022, Share Print X Print Options: Print this page Print all  
 review pages: BBB Business Reviews may not be reproduced for sales ...

7 **Exotic Meat Markets** in , California with Reviews & Ratings ...  
 www.yellowpages.com/ca/exotic-meat-markets >  
 30+ Items - Find 2334 listings related to **Exotic Meat Markets** in on YP.com. See reviews, photos,  
 directions, phone numbers and more for the best **Meat Markets** in CA.

8 **NWWP Fish Market** - Northwest Wild Products  
 www.northwestwildproducts.com/exotics\_meats >  
 Exotic Meats and wild game in Astoria Oregon. Steaks, burgers, ground meat. Over 40 exotic meats.  
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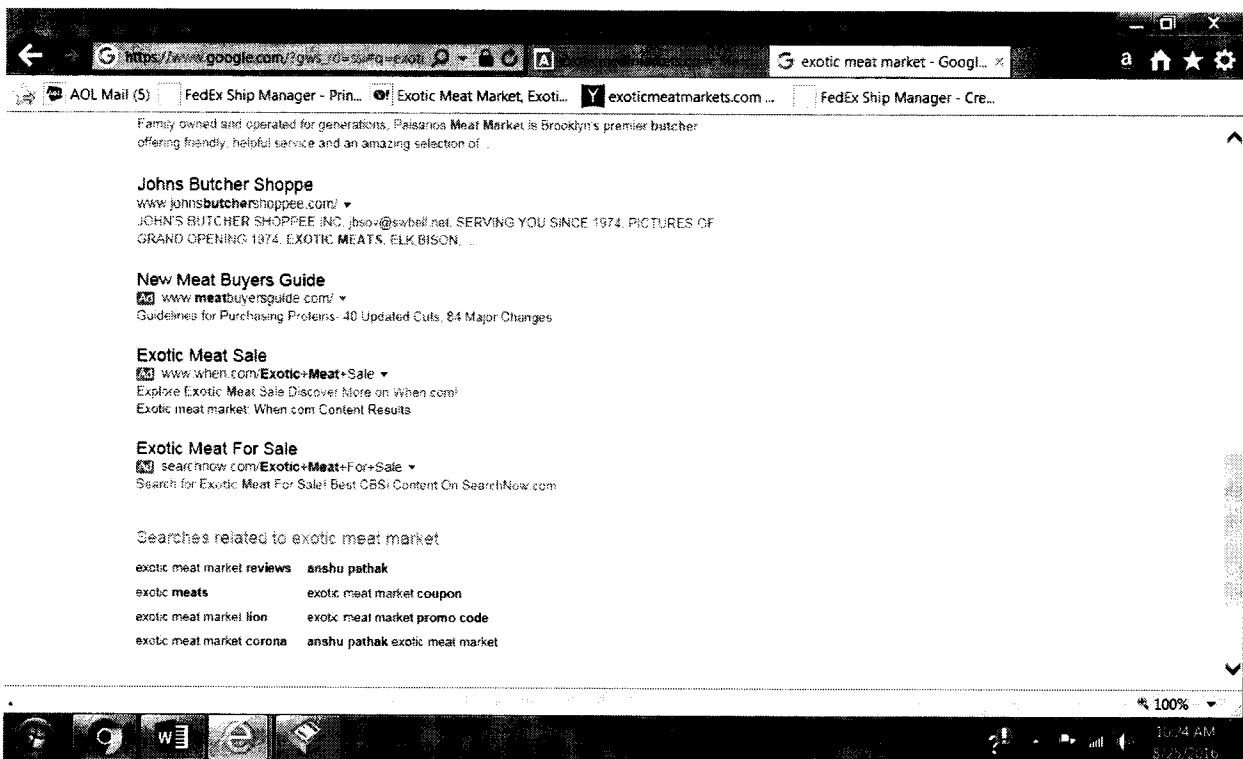
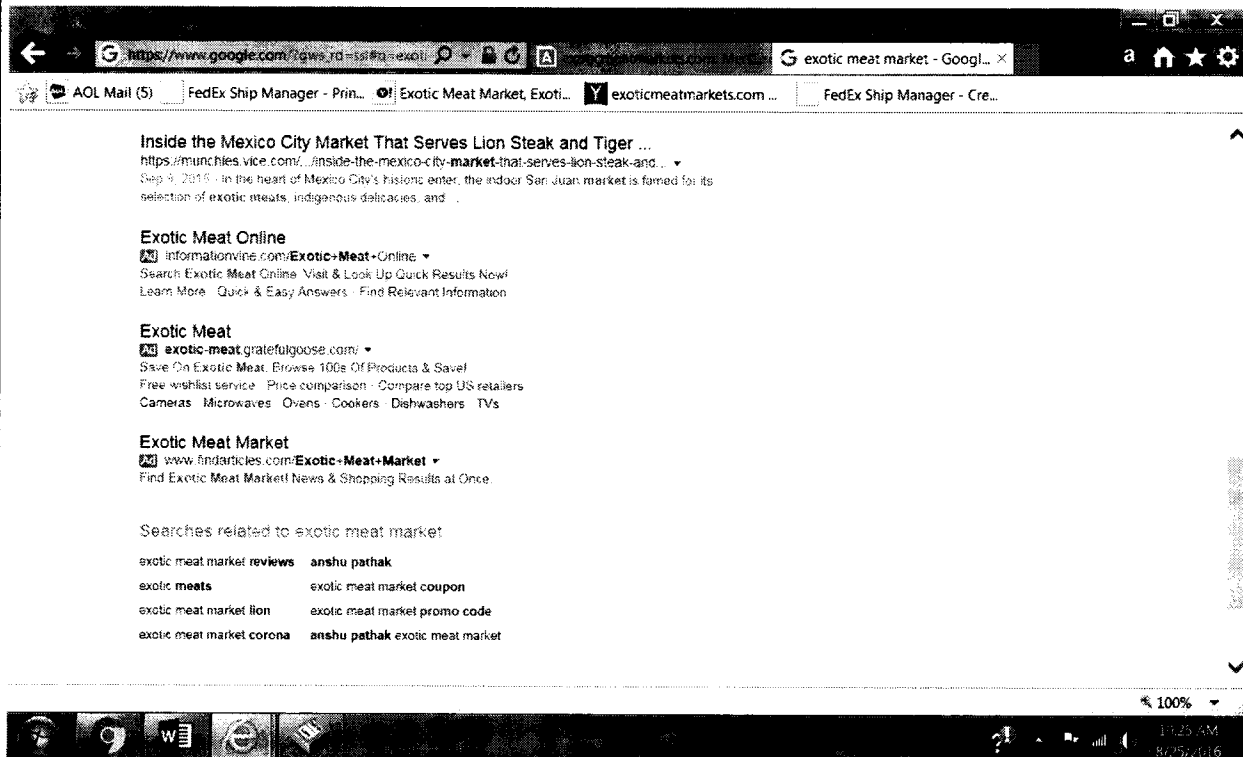
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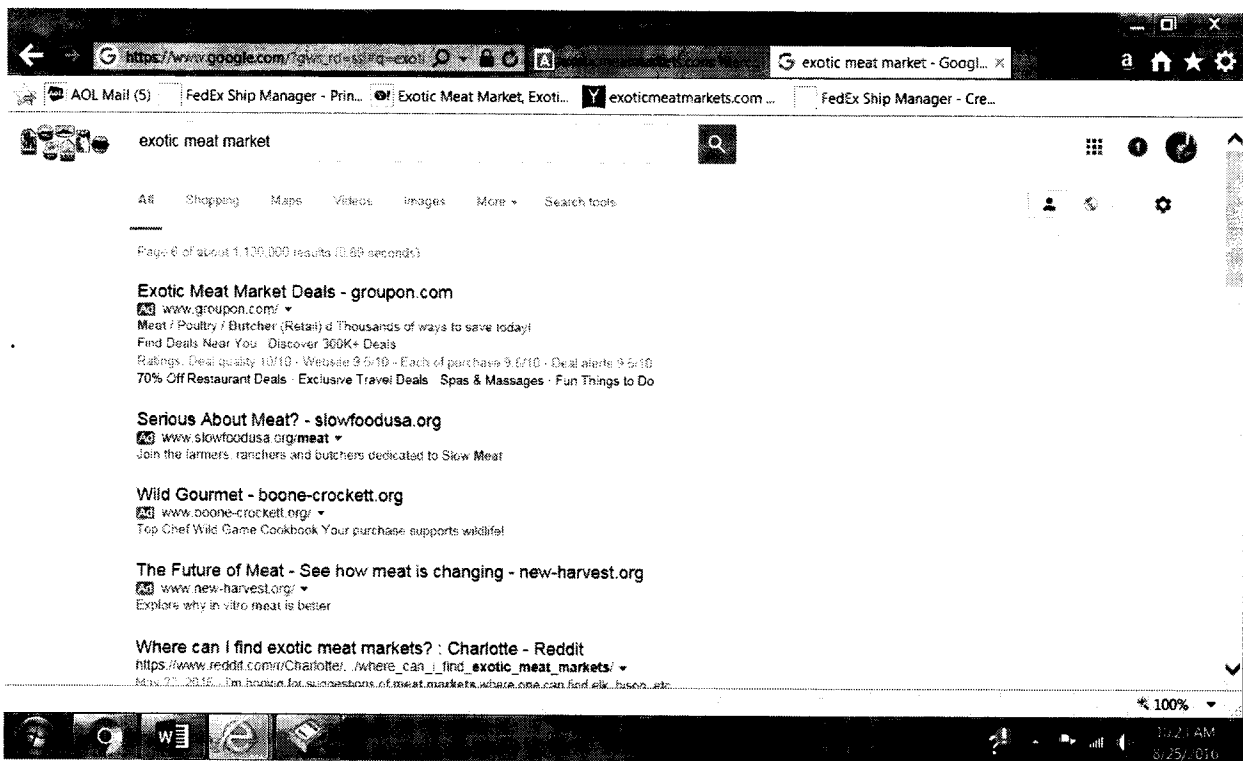
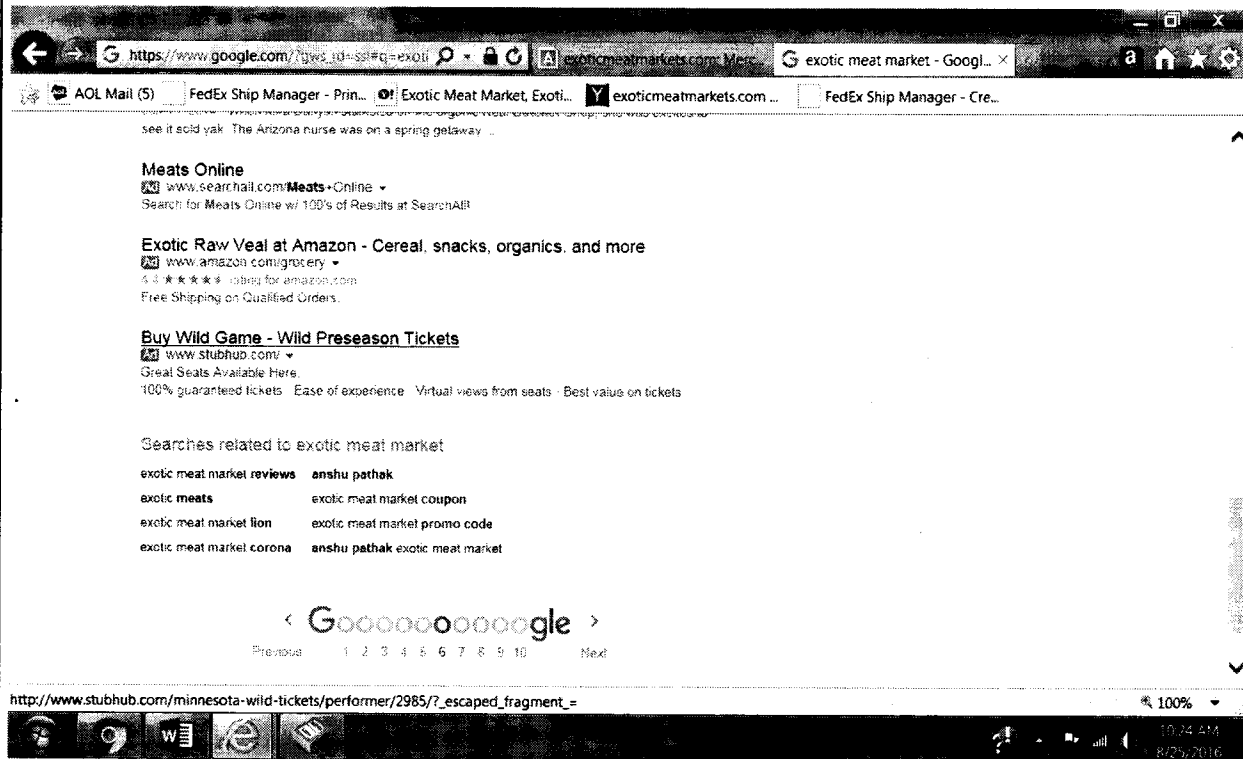
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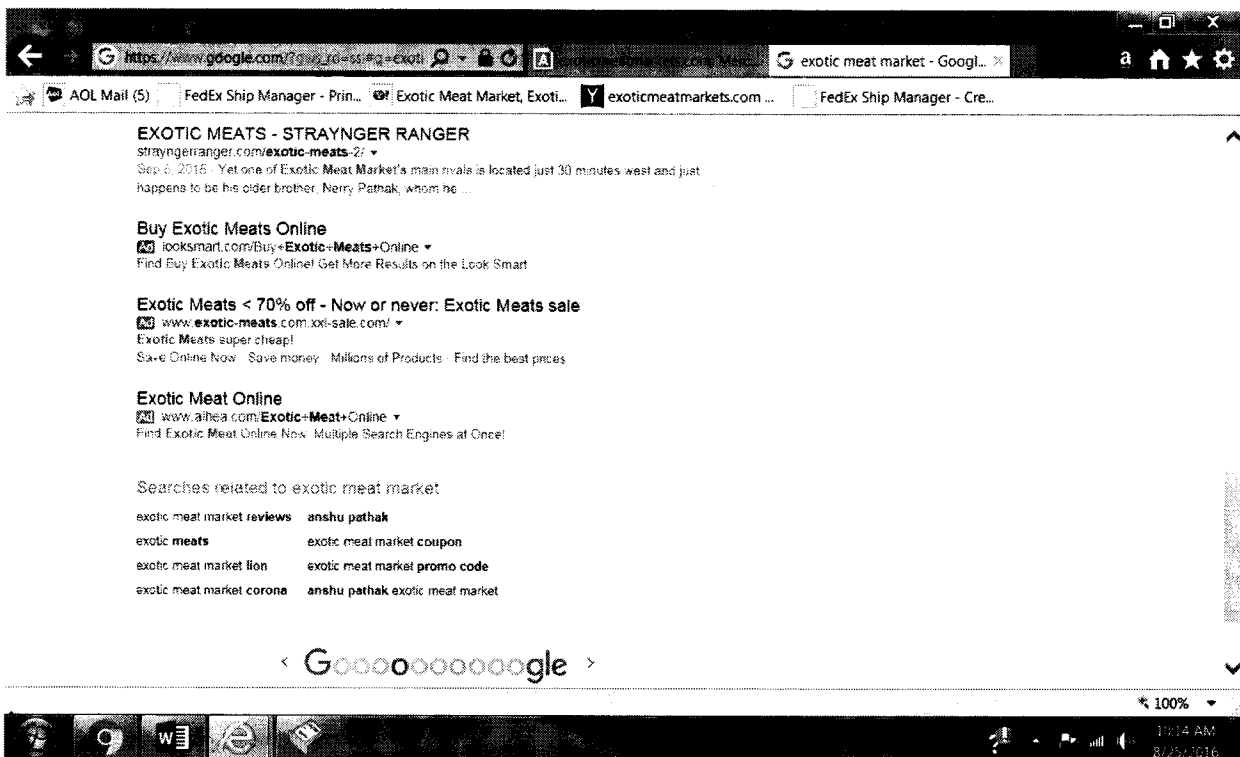
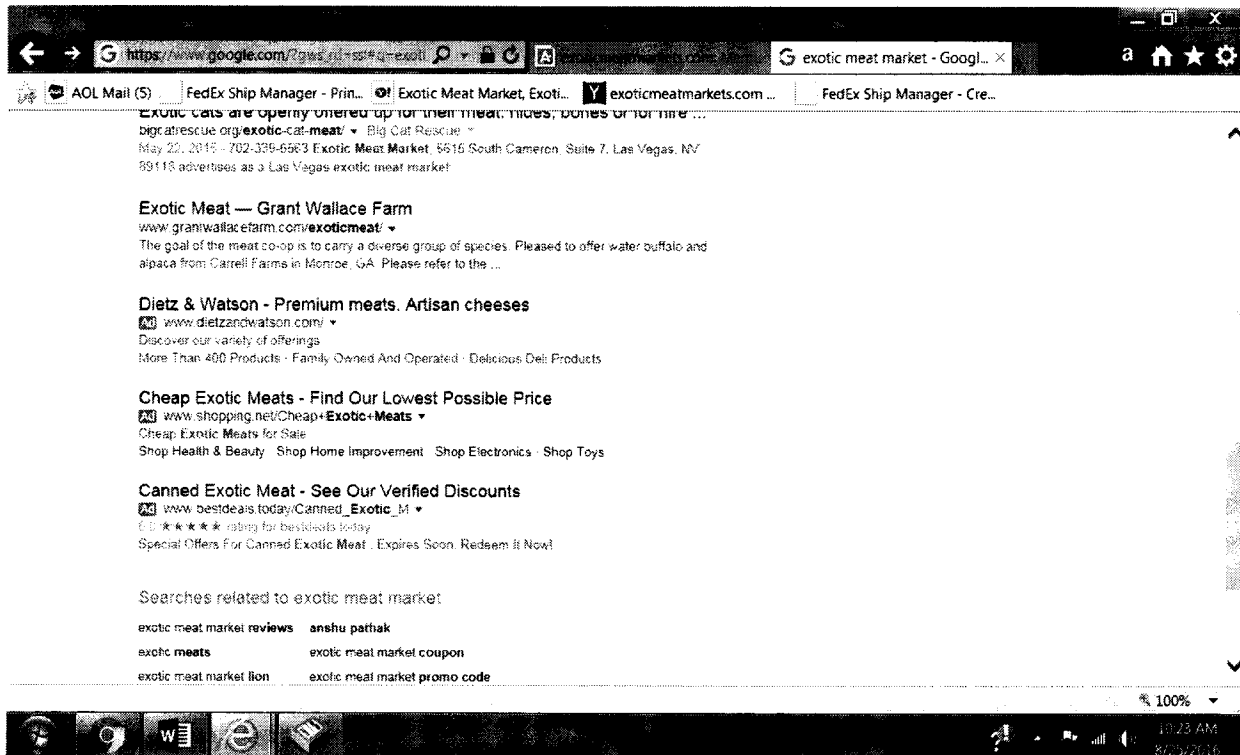
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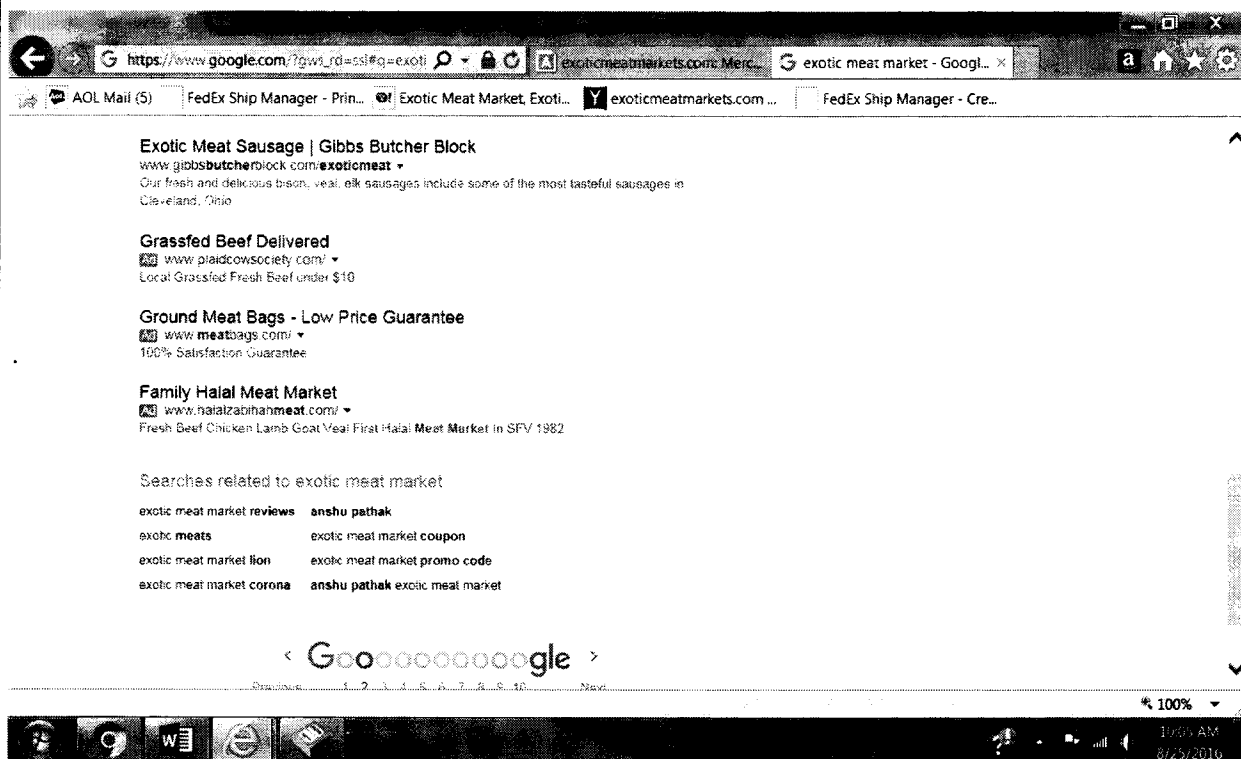
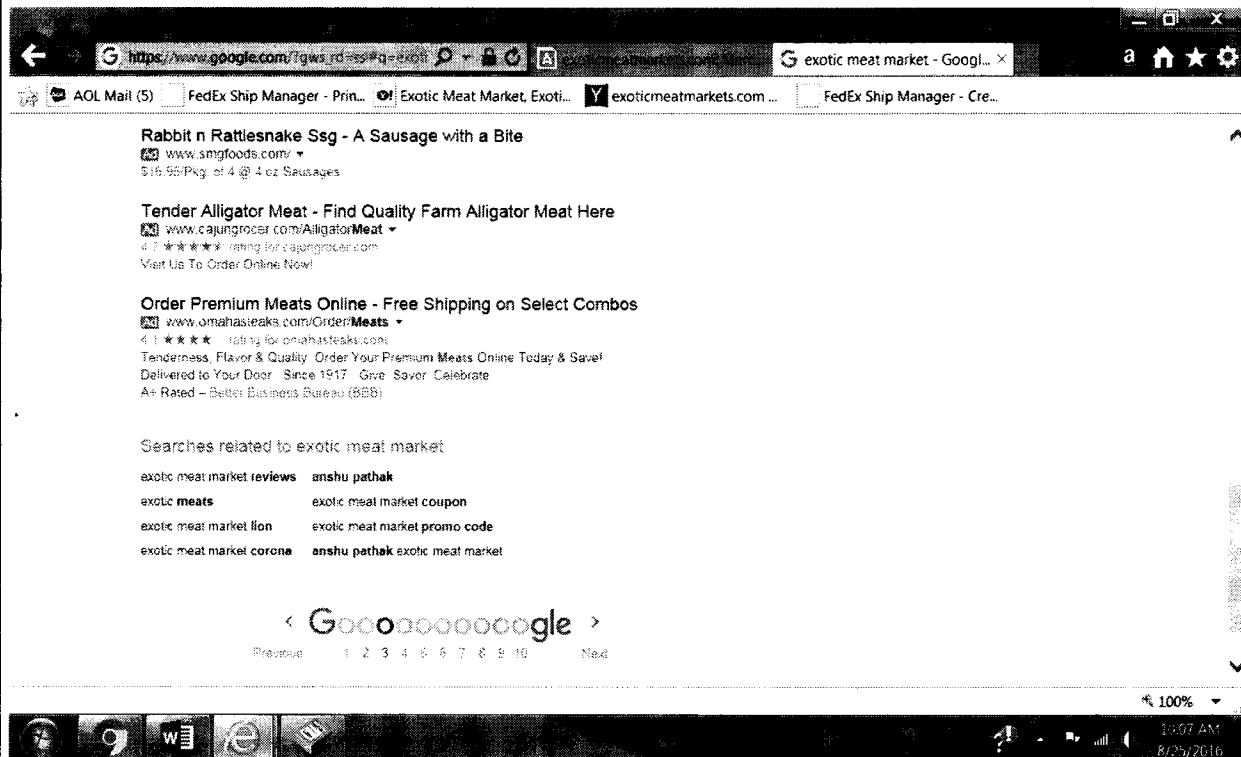
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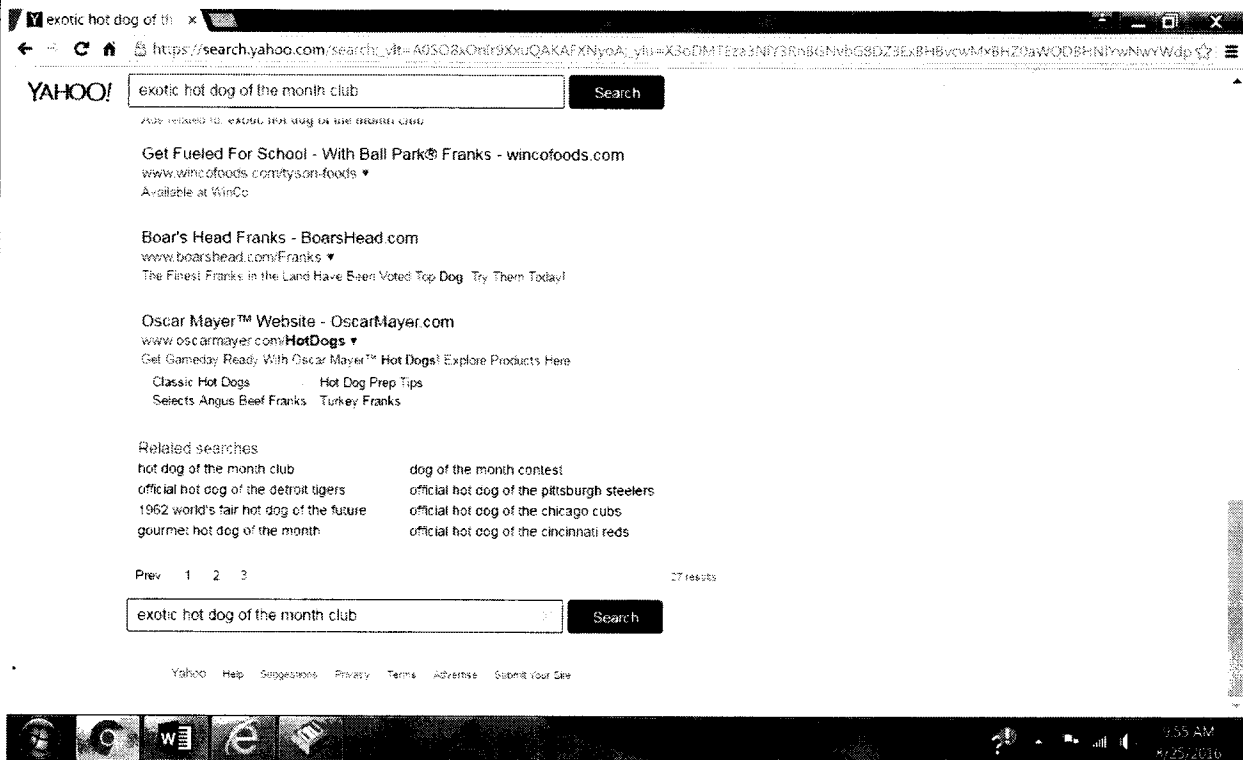
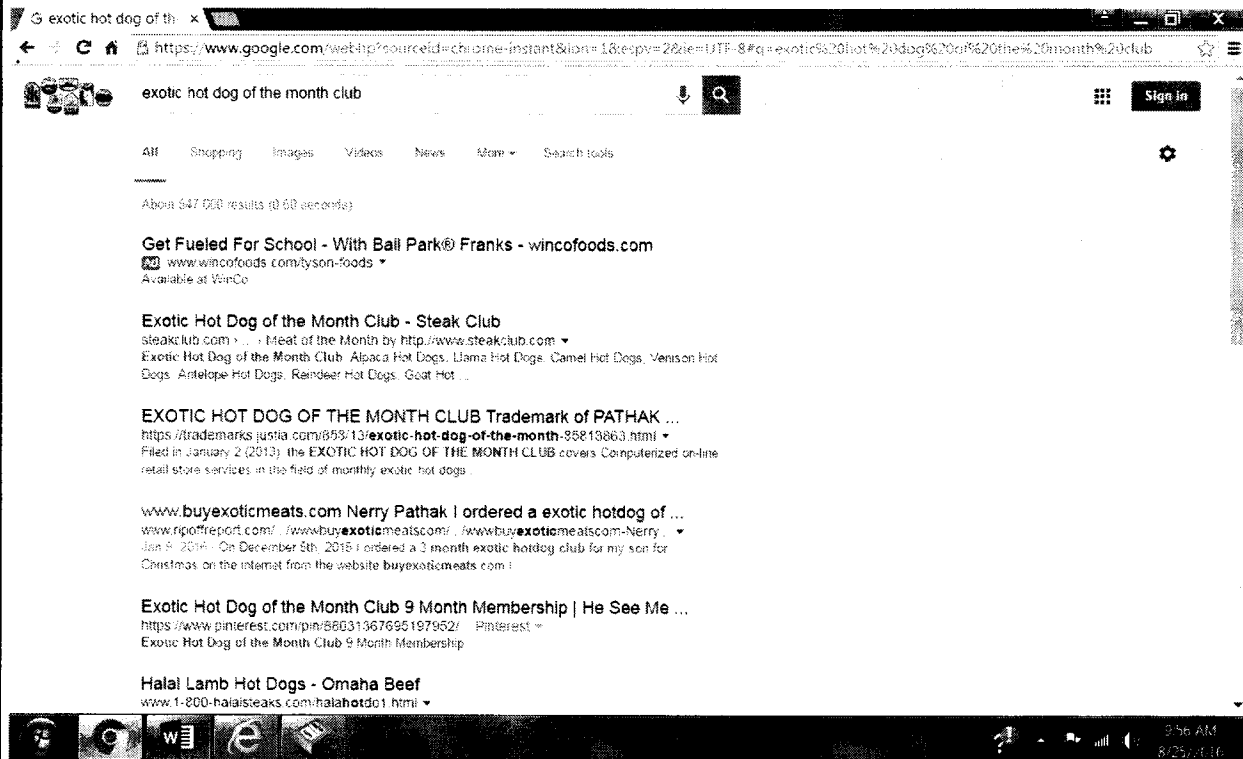
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The screenshot shows a Yahoo! search results page. At the top, the search bar contains the text "exotic meat market" and the URL "https://search.yahoo.com/search?\_ylt=AQC06vsOH79XgcoAIFXNyoA;\_ylu=X3oDMTEza3NPy3RnBG9vbkG8Dz3ExBhBvcwMx8HZ0aWQD6HNlywNwyWdpk...". Below the search bar, the results are displayed. The first result is "Exotic Meat" from Gratefulgoose.com/Exotic-Meat, with a snippet "Save On Exotic Meat." The second result is "Exotic Meat Market - Exotic Meat Market Search Now!" from About.com/Exotic Meat Market, with a snippet "Exotic Meat Market Search Now! Over 85 Million Visitors". The third result is "100% Grass-Fed Bison | grassfedtraditions.com" from www.grassfedtraditions.com, with a snippet "Produced by family farms with animals that graze on pasture!". Below the results, there is a section "Also try" with a list of related searches: "exotic meat market perris ca", "lion meat", "exotic meat market san antonio", "exotic meat market review", "exotic meat market houston", "exotic meat", "exotic meat market fort worth tx", and "fake name generator". At the bottom, there is a pagination bar showing "Prev 18 19 20 21 22 Next" and "3,600,000 results". The search bar at the bottom also contains "exotic meat market" and a "Search" button. The footer of the page includes links for "Yahoo", "Help", "Suggestions", "Privacy", "Terms", "Advertise", "Submit Your Site", and "Powered by Bing™".

Y exotic meat market

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**YAHOO!**

Bloomington, NJ 67506 Phone: 973-817-3155. Store Hours: Monday - Friday 10...

Ads related to: exotic meat market

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Gratefulgoose.com/Exotic-Meat  
Save On Exotic Meat.

**Exotic Meat Market - Exotic Meat Market Search Now!**  
About.com/Exotic Meat Market  
Exotic Meat Market Search Now! Over 85 Million Visitors

**100% Grass-Fed Bison | grassfedtraditions.com**  
www.grassfedtraditions.com  
Produced by family farms with animals that graze on pasture!

Also try

exotic meat market perris ca	lion meat
exotic meat market san antonio	exotic meat market review
exotic meat market houston	exotic meat
exotic meat market fort worth tx	fake name generator

Prev 18 19 20 21 22 Next 3,600,000 results

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https://search.yahoo.com/search?\_ylt=A0S08ksCH79XgpcARFXNyoA;\_ylu=X3bDMTEza3NlY3RnBG9vYyBzG8DZ3Ex0HBvzWMx0BHZ0aWQ0BHNyWwVWdpb;\_ylt=A0S08ksCH79XgpcARFXNyoA;\_ylu=X3bDMTEza3NlY3RnBG9vYyBzG8DZ3Ex0HBvzWMx0BHZ0aWQ0BHNyWwVWdpb

YAHOO! exotic meat market Search

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Also try: exotic meat market perris ca exotic meat market san antonio

Ads related to: exotic meat market

**100% Grass-Fed Bison | grassfedtraditions.com**  
www.grassfedtraditions.com  
Produced by family farms with animals that graze on pasture!

**Exotic Meat Market - Exotic Meat Market Search Now!**  
About.com/Exotic Meat Market  
Exotic Meat Market Search Now! Over 85 Million Visitors.

**Tampa Steak Company**  
tampasteak.com  
Welcome to Tampa Steak. Tampa Steak Company is a family operated wholesale food distributor and retail meat market that is open to the public.

**Marketing and Pricing "Exotic" Meat — Fuller...**  
www.meatchris.com/marketing-and-pricing-  
With careful marketing and proper pricing, Hollow Hill Farm has won the hearts of many first-time bison eaters. Today we won't touch on the very exotic like lions.

**Exotic Meat Market - Exotic Meat Markets Com**  
http://41759728056354.stores.yahoo.net/efind.html  
Exotic Meats - Exotic Game Meat - Wild Game Meat Abilene Texas Exotic Meats - Exotic Game Meat - Wild Game Meat Amarillo Texas Exotic Meats - Exotic Game Meat - Wild

Ads related to: exotic meat market

**Exotic Meat**  
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YAHOO! exotic meat market Search

Ads related to: exotic meat market

**Grass Fed Meat Results**  
purelocal.com/GrassFedMeat  
Searching for Grass Fed Meat? Find Information and Browse Results Now

**Exotic Meat at Amazon.com**  
www.Amazon.com/Grocery  
4.3 ★★★★★ rating for amazon.com  
Buy Meat & Poultry and Save! Free Shipping on Qualified Orders.

**100% Grass-Fed Bison**  
www.grassfedtraditions.com  
Produced by family farms with animals that graze on pasture!

Also try:  
exotic meat market perris ca lion meat  
exotic meat market san antonio exotic meat market review  
exotic meat market houston exotic meat  
exotic meat market fort worth tx fake name generator

Prev 17 18 19 20 21 Next 3,890,000 results

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Also try: exotic meat market perris ca exotic meat market san antonio

**Exotic Meat Market | 911 Animal Abuse**  
 911animalabuse.com/exotic-meat-market  
 702-738-6563 **Exotic Meat Market**, 6615 South Cameron, Suite 7, Las Vegas, NV 89118 A Las Vegas **exotic meat market**. Unfortunately it is legal to kill lions, cougars and...

**EXOTIC MEAT MARKET - Trademarkia**  
 www.trademarkia.com/map/exotic-meat-market-85644354.n...  
 Driving directions to Patnaik Anshu Bharat and product information about **EXOTIC MEAT MARKET** is provided.

**Wagyu Beef | Grass Fed Beef | Exotic Meats |...**  
 www.broadleafgame.com  
 We have an extensive line of the finest **exotic meats** including Wagyu Beef, Grass Fed Beef, Deer, Buffalo and many other high quality, organic specialty **meats**.

**Marketing and Pricing "Exotic" Meat — Fuller...**  
 www.meatchris.com/marketing-and-pricing-  
 With careful marketing and proper pricing, Hollow Hill Farm has won the hearts of many first-time bison eaters. Today we won't touch on the very **exotic** like lions.

**Tampa Steak Company**  
 tampasteak.com  
 Welcome to Tampa Steak. Tampa Steak Company is a family operated wholesale food distributor and retail **meat market** that is open to the public.

Ads related to: exotic meat market

**100% Grass-Fed Bison**  
 www.grassfedtraditions.com  
 Produced by family farms with animals that graze on pasture!

**Exotic Meat at Amazon.com**  
 www.amazon.com/Grocery  
 4.0 ★★★★★ rating for amazon.com  
 Buy **Meat** & Poultry and Save. Free Shipping on Qualified Orders.

**Grass Fed Meat Results**  
 purelocal.com/GrassFedMeat  
 Searching for Grass Fed **Meat**? Find information and Browse Results Now.

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 OmahaSteaks.com/Meats  
 Tenderness, Flavor & Quality. Order Your Premium **Meat** Online Now!

Y exotic meat market x

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YAHOO! exotic meat market Search

Ads related to: exotic meat market

**Grass Fed Meat Results**  
 purelocal.com/GrassFedMeat  
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 4.0 ★★★★★ rating for amazon.com  
 Buy **Meat** & Poultry and Save. Free Shipping on Qualified Orders.

**100% Grass-Fed Bison**  
 www.grassfedtraditions.com  
 Produced by family farms with animals that graze on pasture!

Also try:

exotic meat market perris ca	lion meat
exotic meat market san antonio	exotic meat market review
exotic meat market houston	exotic meat
exotic meat market fort worth tx	fake name generator

Prev 16 17 18 19 20 Next 3,696,000 results

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 Extensive line of beef, pork, chicken, lamb, veal, marinated products, and exotic meats such as buffalo and venison. Local, family owned, Roseville Meat Co.

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 Buy Exotic Meats.com, Corona, CA 7,252 likes 4 talking about this 21 were here No Meat is More Tender or Delicious Than Buy Exotic Meats.com. Find...

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 mikesqualitymeats.com  
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 broadleafgame.net/guamameat.html  
 Exotic Meat Market Exotic Meat Market established in 1969 delivers hard to find Exotic Meats from all over the world at your door in the USA and Canada.

**Butchers Market - Premium Meats & Specialty Grocer...**  
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**100% Grass-Fed Bison**  
 www.grassfedtraditions.com  
 Produced by family farms with animals that graze on pasture!

**Exotic Meat at Amazon.com**  
 www.amazon.com/Grocery  
 4.0 ★★★★★ rating for amazon.com  
 Buy Meat & Poultry and Save! Free Shipping on Qualified Orders

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 ballparkbrand.com/NameGrilledJerky  
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ballparkbrand.com/flamegrilledjerky  
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www.culebrameatmarket.com/quality-baked-goods  
We at Culebra Meat Market take pride in offering you fresh, flavorful meat, poultry, seafood, deli meats and cheese. You'll also find a variety of exotic meats such as...

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exotic meat market san antonio	exotic meat market review
exotic meat market houston	exotic meat
exotic meat market fort worth tx	fake name generator

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1 exotic meat market x

2 [https://search.yahoo.com/search?\\_ylt=AwrSbhs5HnXAKEAIE1XNy0A...\\_ylu=X3oDMTEza3NlY3RnBGNvbG8DZ3E5BHBvcwMxZH0aWQcDEHNlYwNwYWdpbGp...](https://search.yahoo.com/search?_ylt=AwrSbhs5HnXAKEAIE1XNy0A..._ylu=X3oDMTEza3NlY3RnBGNvbG8DZ3E5BHBvcwMxZH0aWQcDEHNlYwNwYWdpbGp...)

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6 Ads related to: exotic meat market

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8 **Exotic Meat Market - Exotic Meat Market Search Now!**  
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9 **Exotic Meats USA - Meat Shops - San Antonio, TX - ...**  
www.yelp.com › Food › Specialty Food › Meat Shops  
Work at Exotic Meats USA? Claim your business. Respond to reviews and privately message customers. Claiming is free, and only takes a minute. Claim This Business

10 **Exotic Meat Market - Wallingford, CT, USA - Yahoo**  
yhs:41759728056354 stores.yahoo.net/exmeniawactus.html  
Iguana Meat - Wild American Iguana - Kangaroo Meat - Kobe Beef from Japan

11 **Wild Game - Dorfler's Meats**  
www.dorflersmeats.com/butcher-shop/wild-game  
Dorfler's Meat Market Offers the Finest in Exotic Meats and Wild Game! Your family will appreciate you for making the healthy choice to incorporate all natural

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Save On Exotic Meat

15 **100% Grass-Fed Bison | grassfedtraditions.com**  
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16 Also try:

17 exotic meat market perris ca lion meat

18 exotic meat market san antonio exotic meat market review

19 exotic meat market houston exotic meat

20 exotic meat market fort worth tx fake name generator

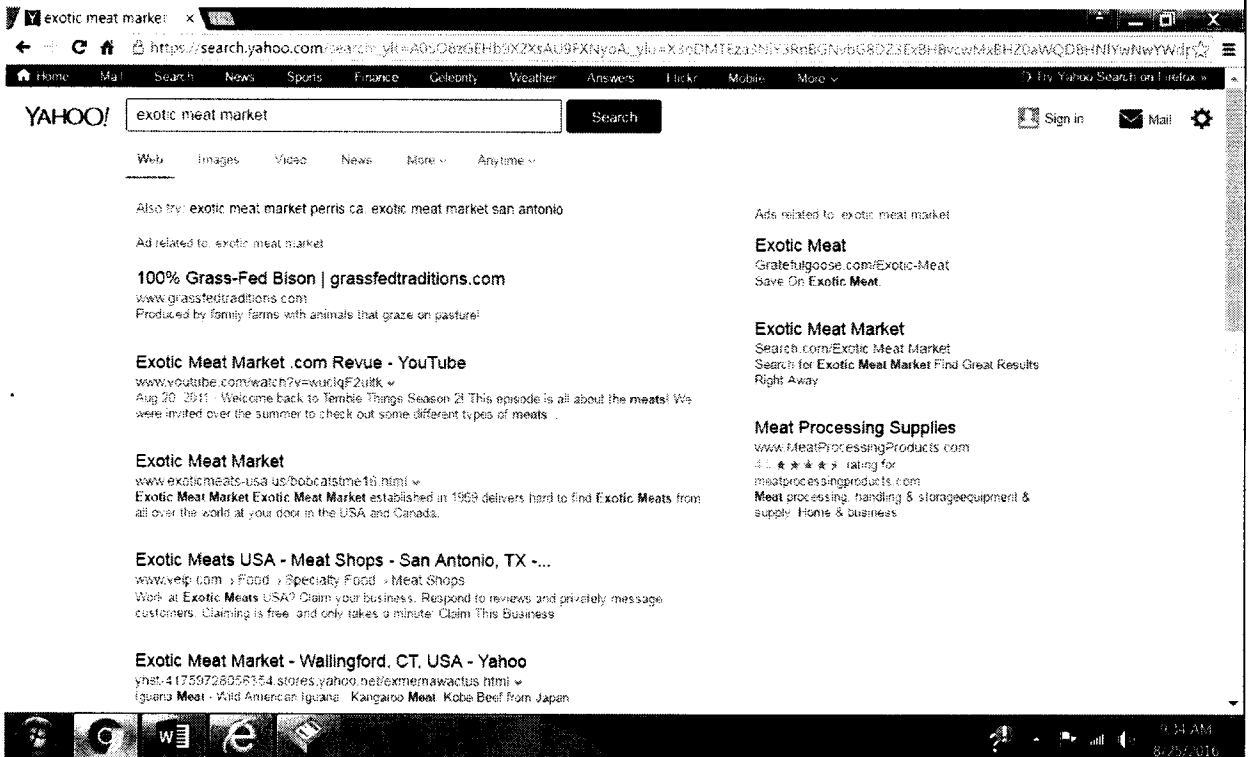
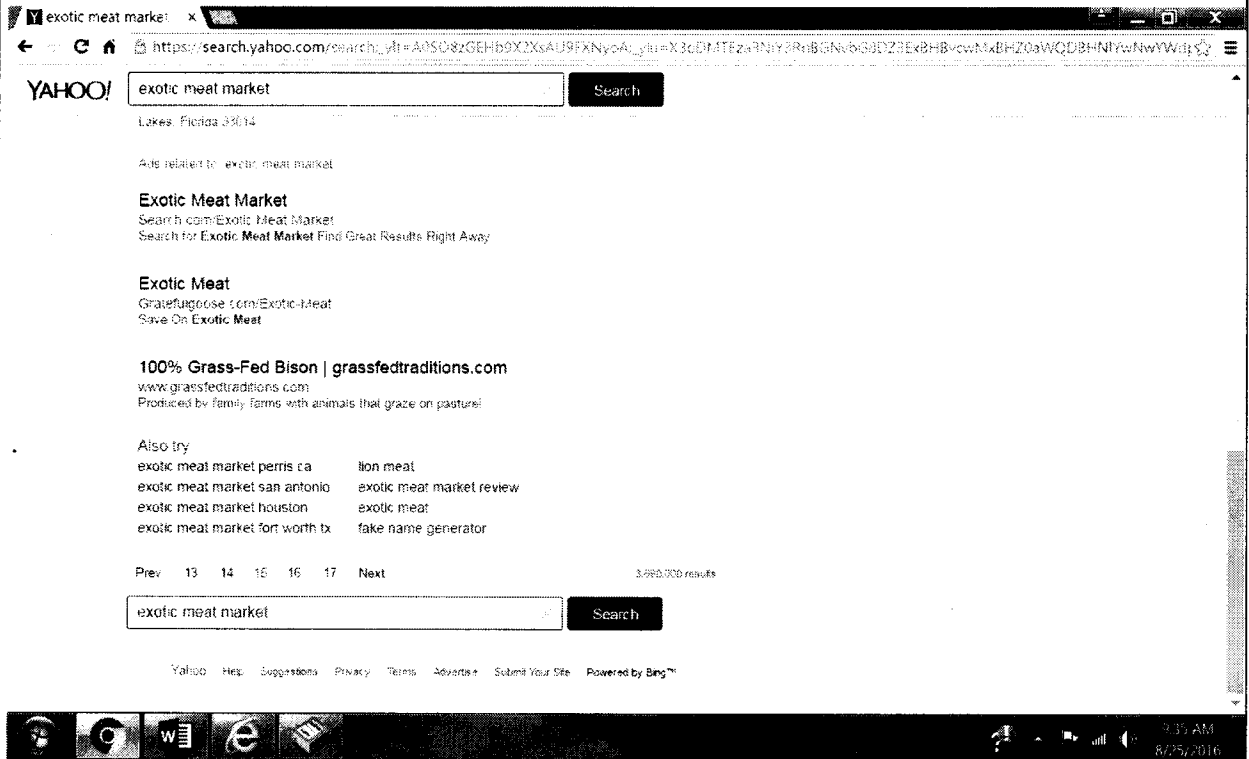
21 Prev 13 14 15 16 17 Next 3,000,000 results

22 exotic meat market Search

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 exotic meat market houston    exotic meat  
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Ad related to: exotic meat market

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**Country Butcher Fine Foods Market - Kennett...**  
countrybutchermarket.com/meat.html v  
Dry-aged USDA Prime Beef, Lamb, Pork, Veal, Boli & Evans® Chicken & Exotic Meats

**All About Us - Exotic Meat Markets**  
exoticmeatmarkets-miami-florida-usa.com/info.html v  
Exotic Meat Market Exotic Meat Market established in 1969 delivers hard to find Exotic Meats from all over the world at your door in the USA and Canada.

**Our Meats - John's Market**  
www.johnseigenmarket.com/our-meats v  
John's Elgin Market is a wild game meat market online store and retail deer processing center that has been providing quality meats since 1990

**PATHAK v. EXOTIC MEAT MARKET, INC. - Leagle.com**  
www.leagle.com/decision/in\_FDCD\_20160503F62/PATHAK v... v  
Order Directing Exotic Meat Market, Inc. to Retain Counsel or Face Default. JENNIFER A DORSEY, District Judge, Anshu Pathak sues Exotic Meat Market, Inc. for fraud.

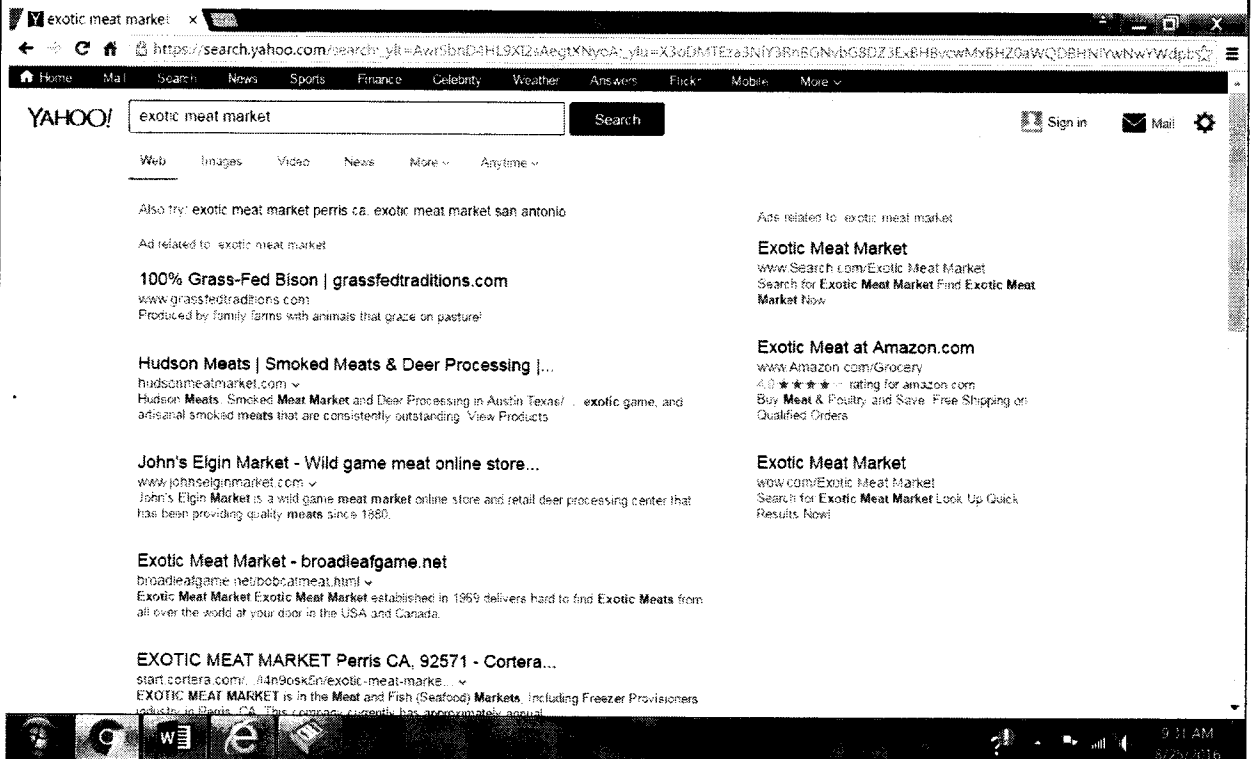
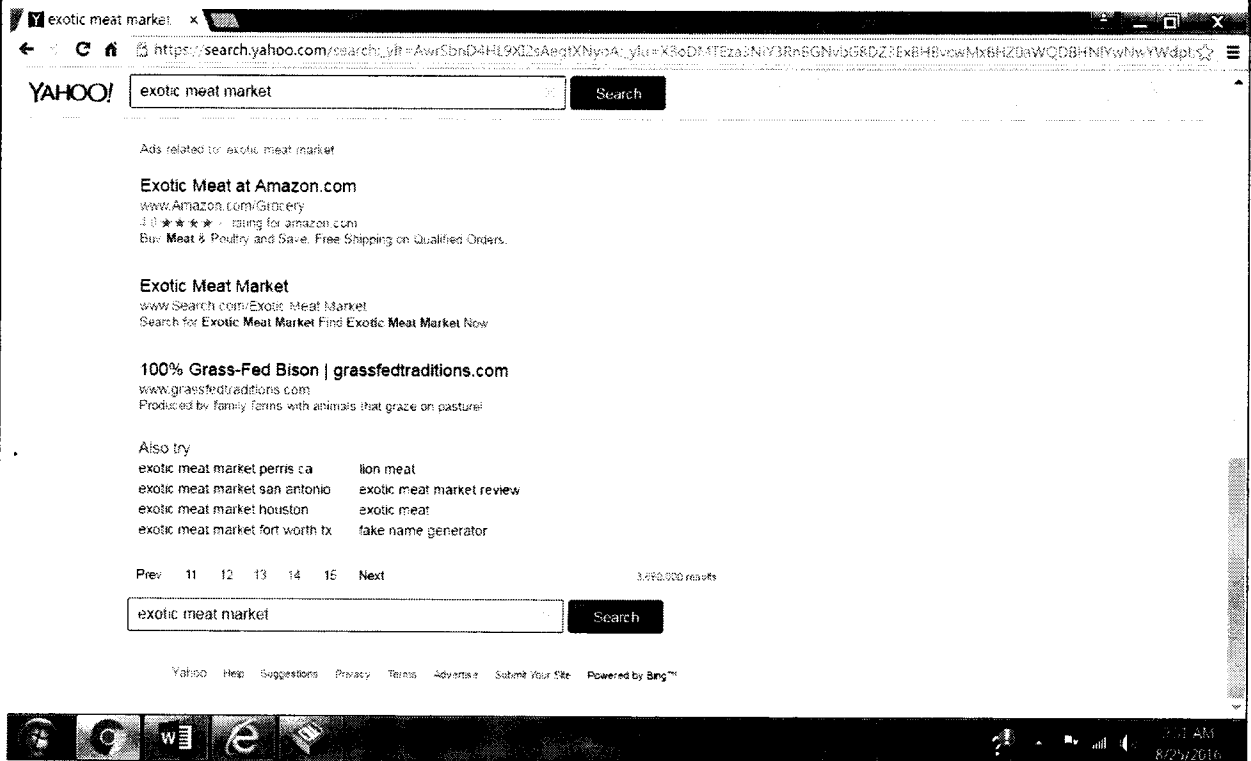
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Save On Exotic Meat





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has been providing quality meats since 1980

Ads related to: exotic meat market

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alot.com/exotic-meats  
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www.BuffaloGal.com  
Affordable. All-Natural Bison Meat Fresh from family farm. Buy Online!

**100% Grass-Fed Bison | grassfedtraditions.com**  
www.grassfedtraditions.com  
Produced by family farms with animals that graze on pasture!

Also try  
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exotic meat market houston exotic meat  
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Ads related to: exotic meat market

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www.bisonmeat.us/guineapigmeat.html v  
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**EXOTIC MEAT MARKET Grand Terrace CA, 92313 -...**  
start.cortera.com/.../6m4lqrbn/exotic-meat-marke v  
EXOTIC MEAT MARKET is in the Meat and Fish (Seafood) Markets, including Freezer Provisioners industry in Grand Terrace, CA. This company currently has approximately ...

**Village Meat and Wine**  
villagemeatandwine.com v  
Village Meat and Wine Voted #1 Gourmet Meat Market By Las Vegas Life Magazine. Home: Exotic Meats, Recipes, Company, Contact: 5025 S. Eastern Ave Ste23 Las Vegas ...

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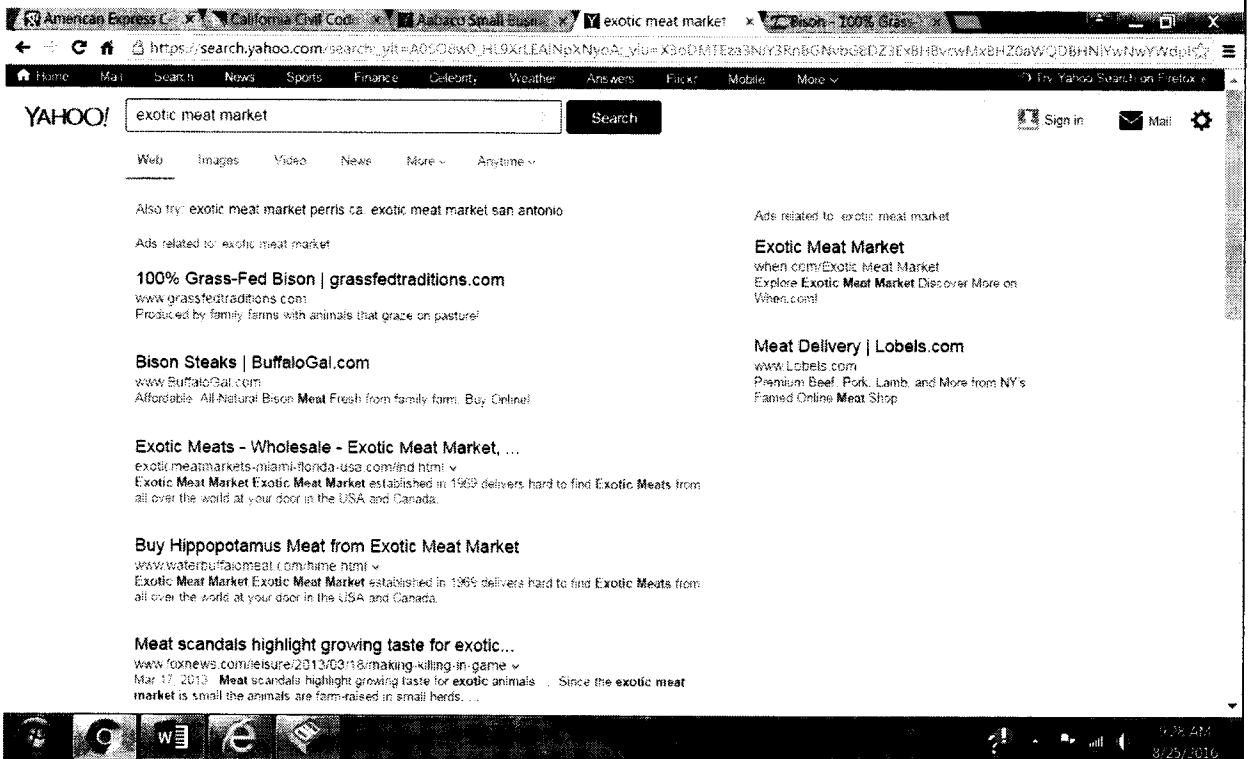
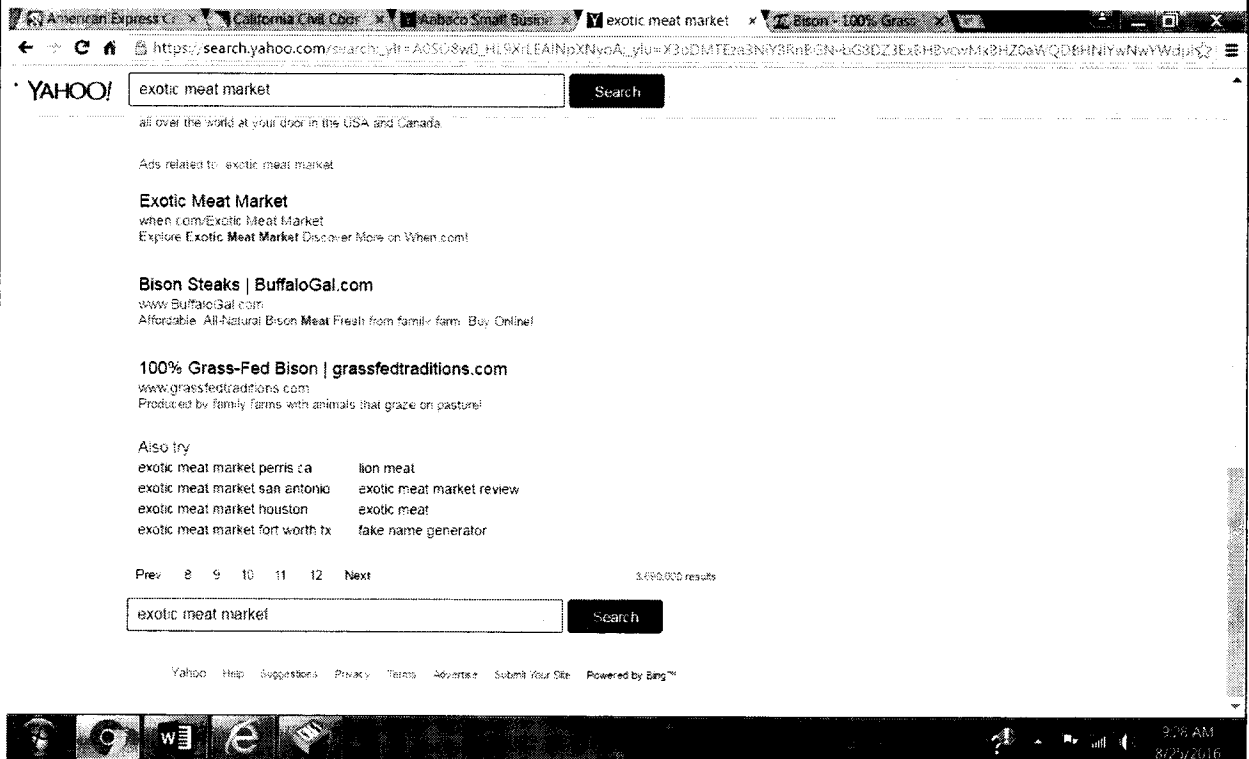
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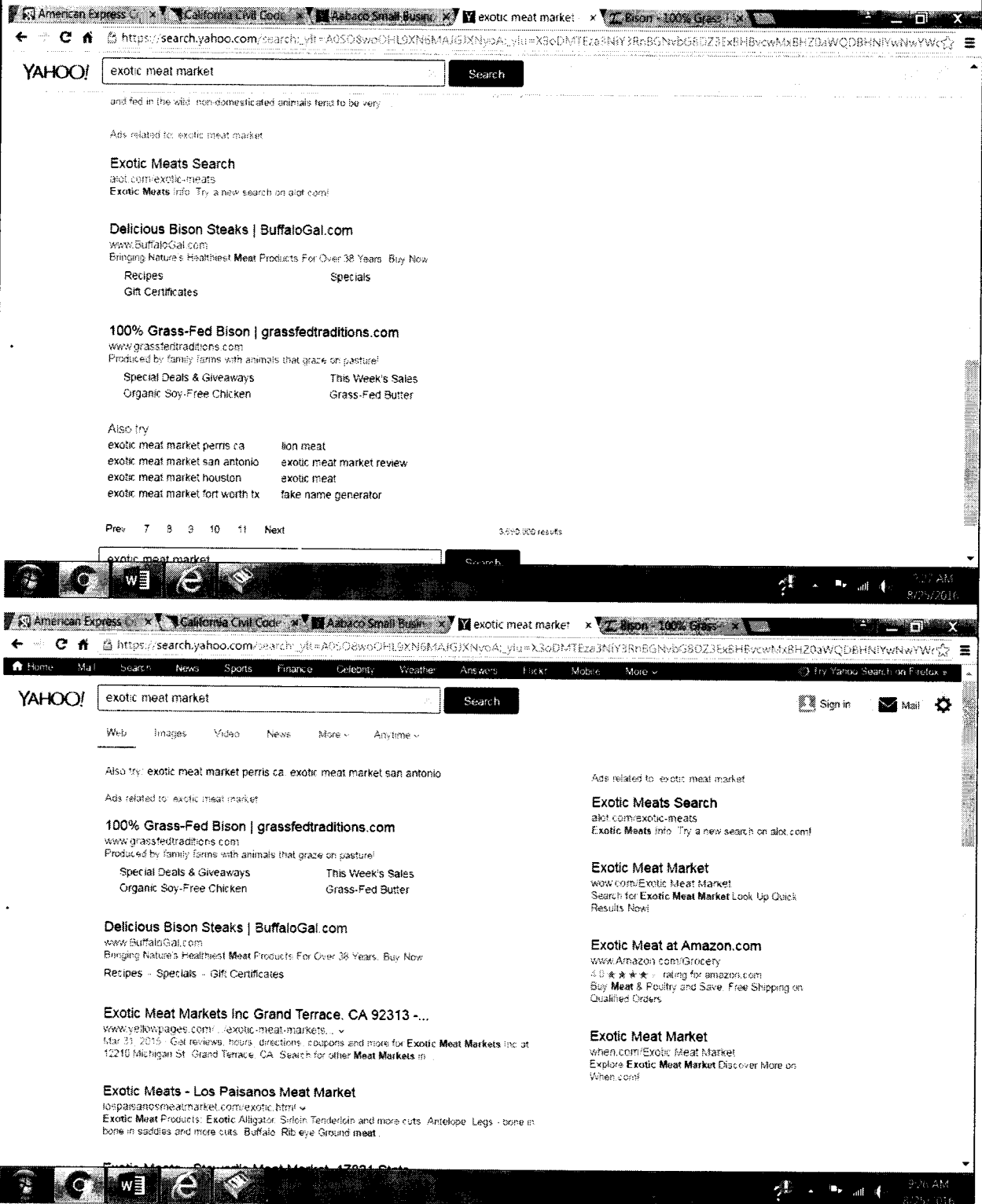
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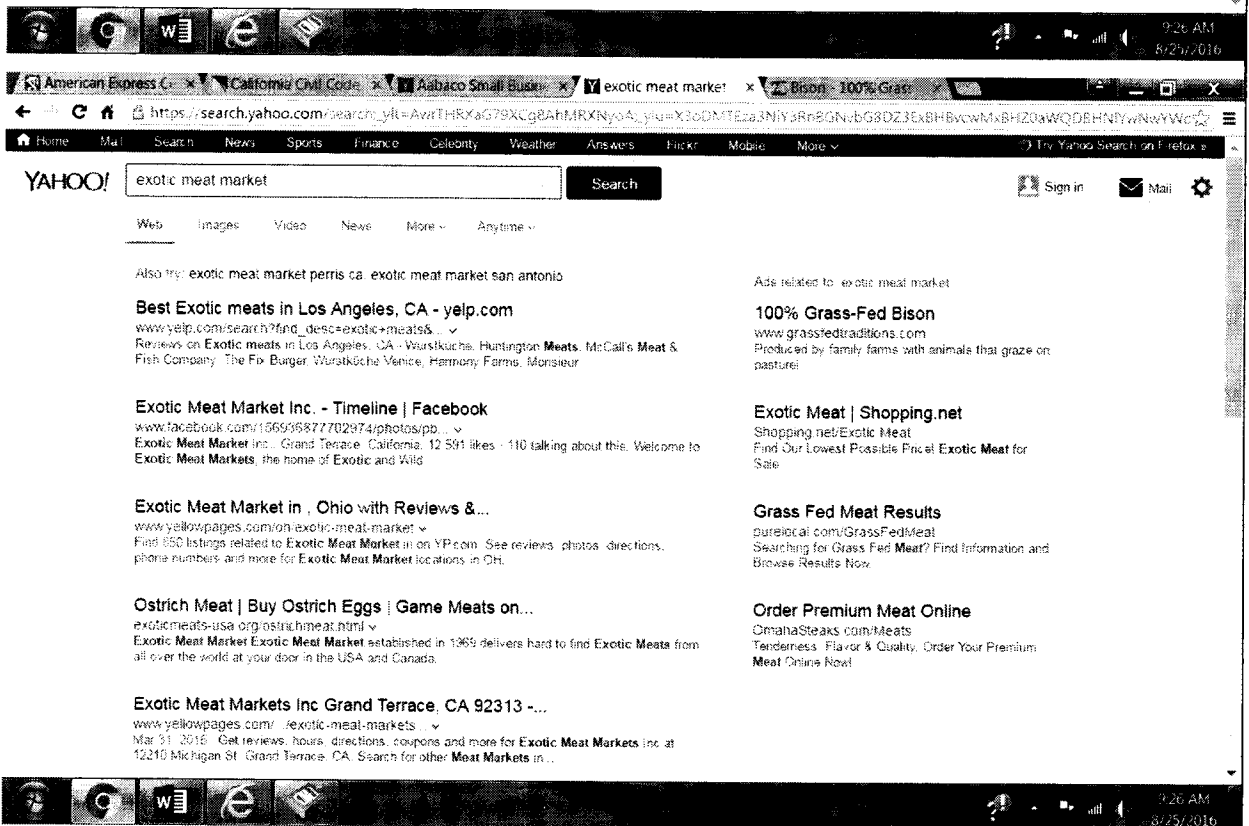
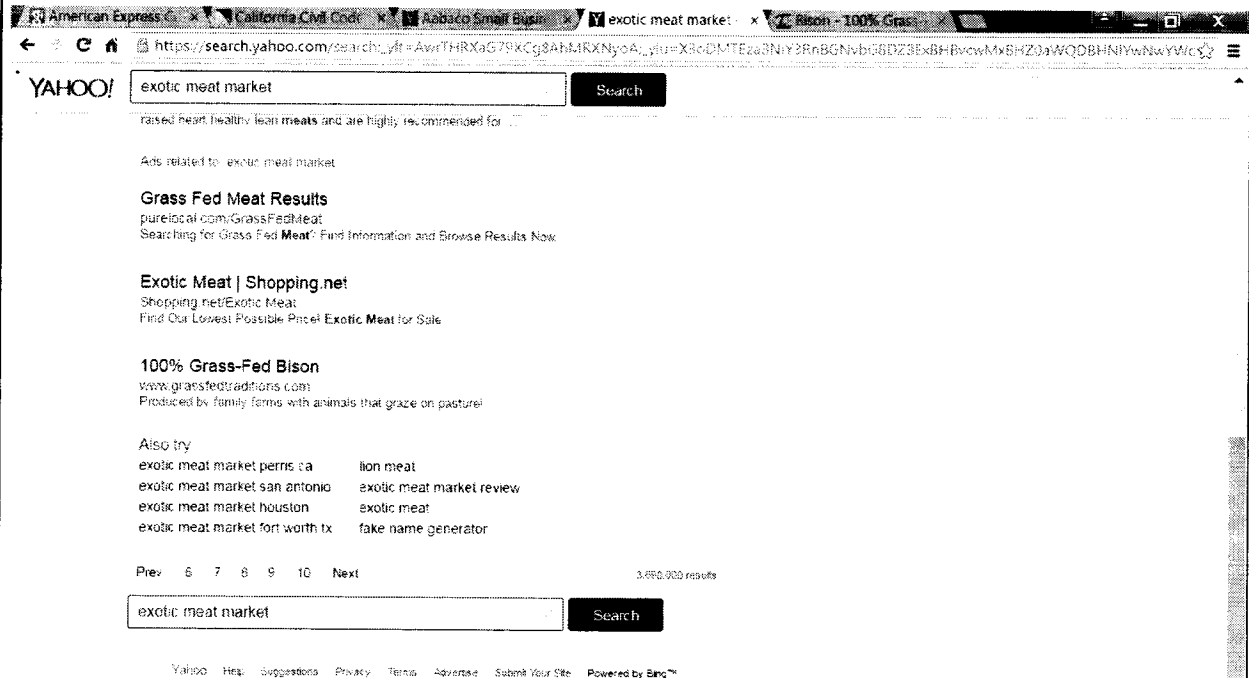
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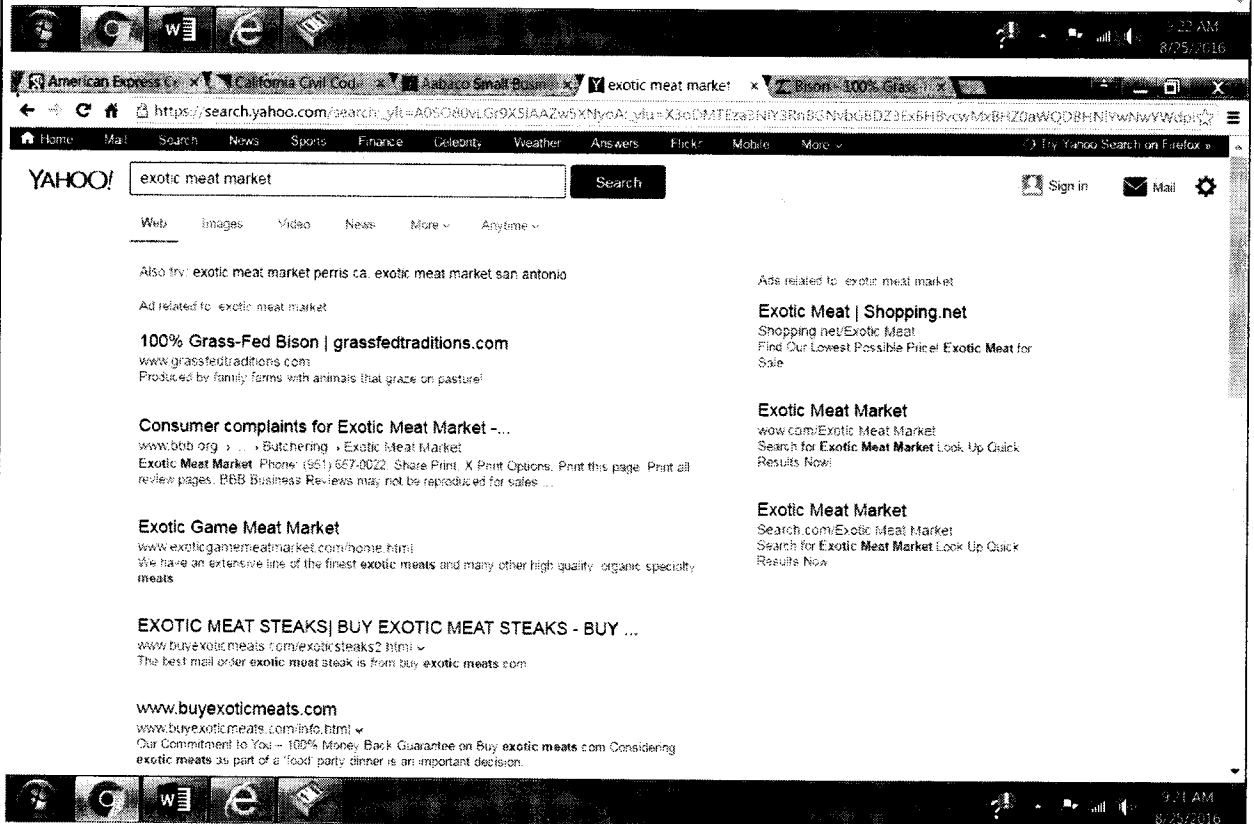
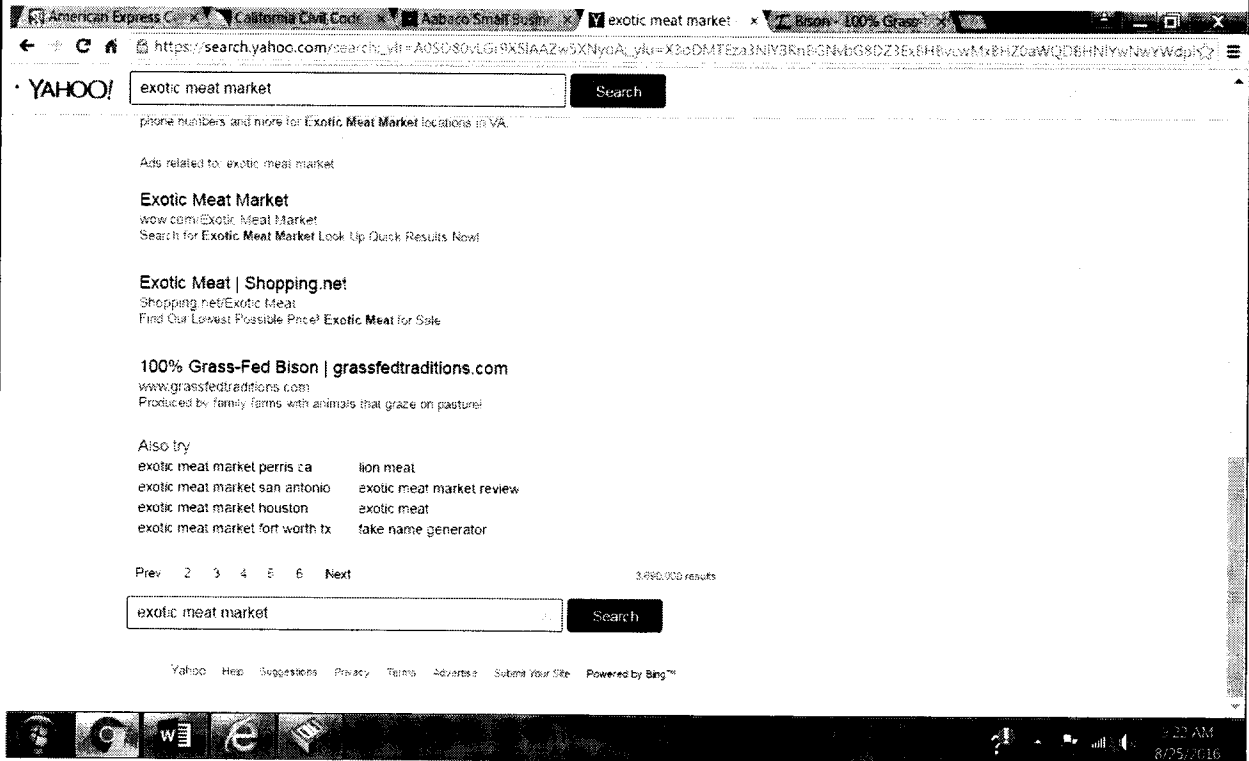
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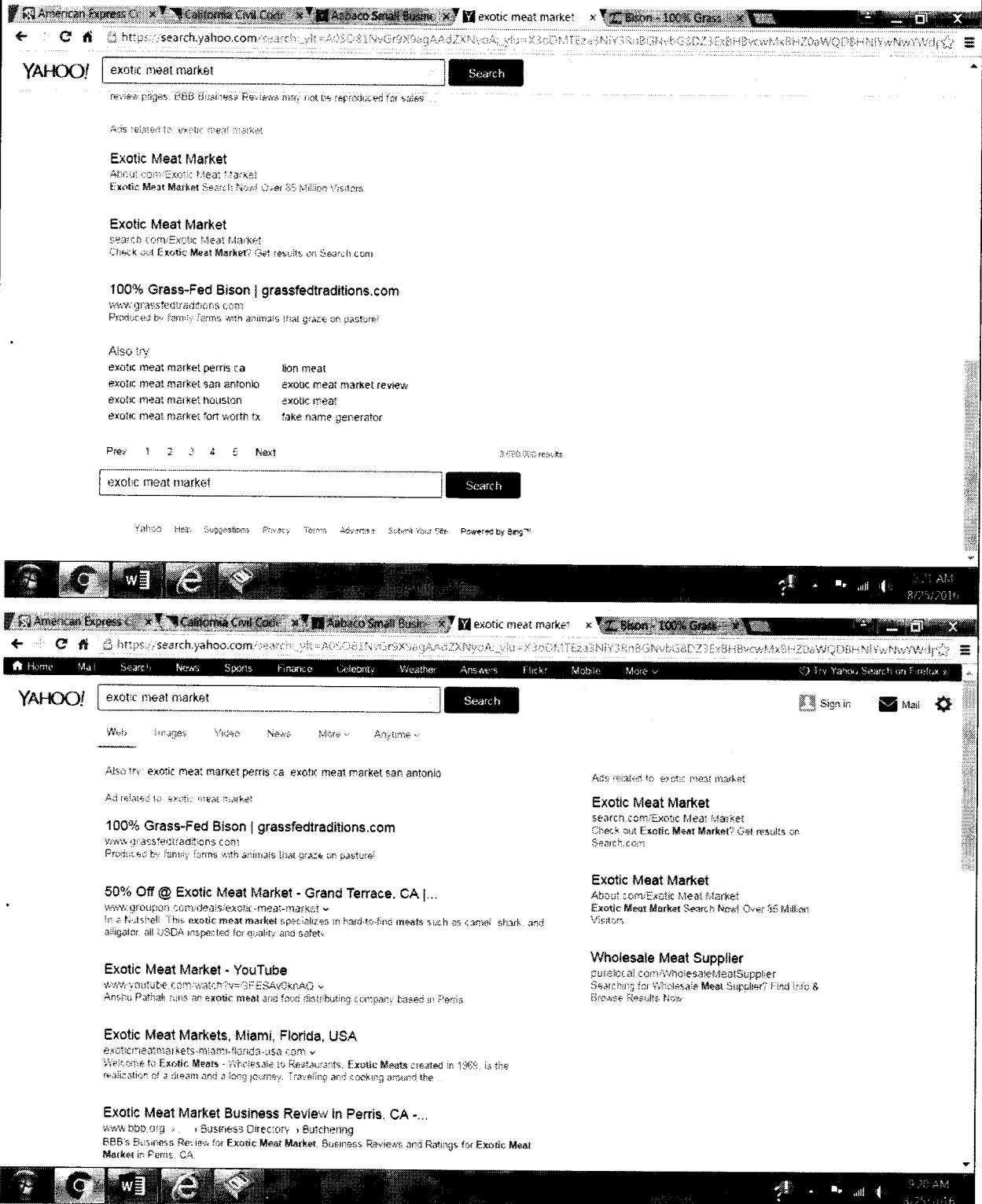
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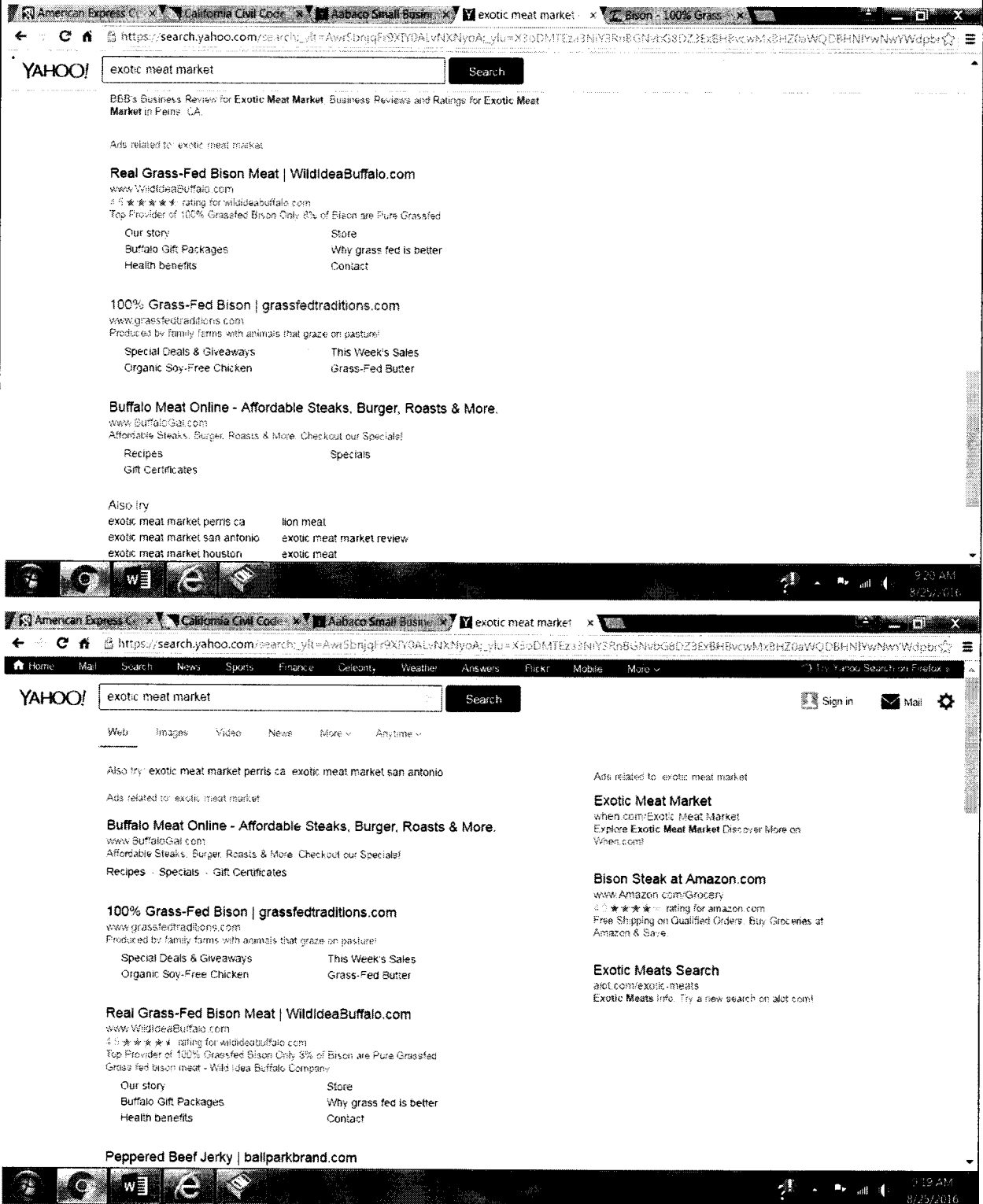
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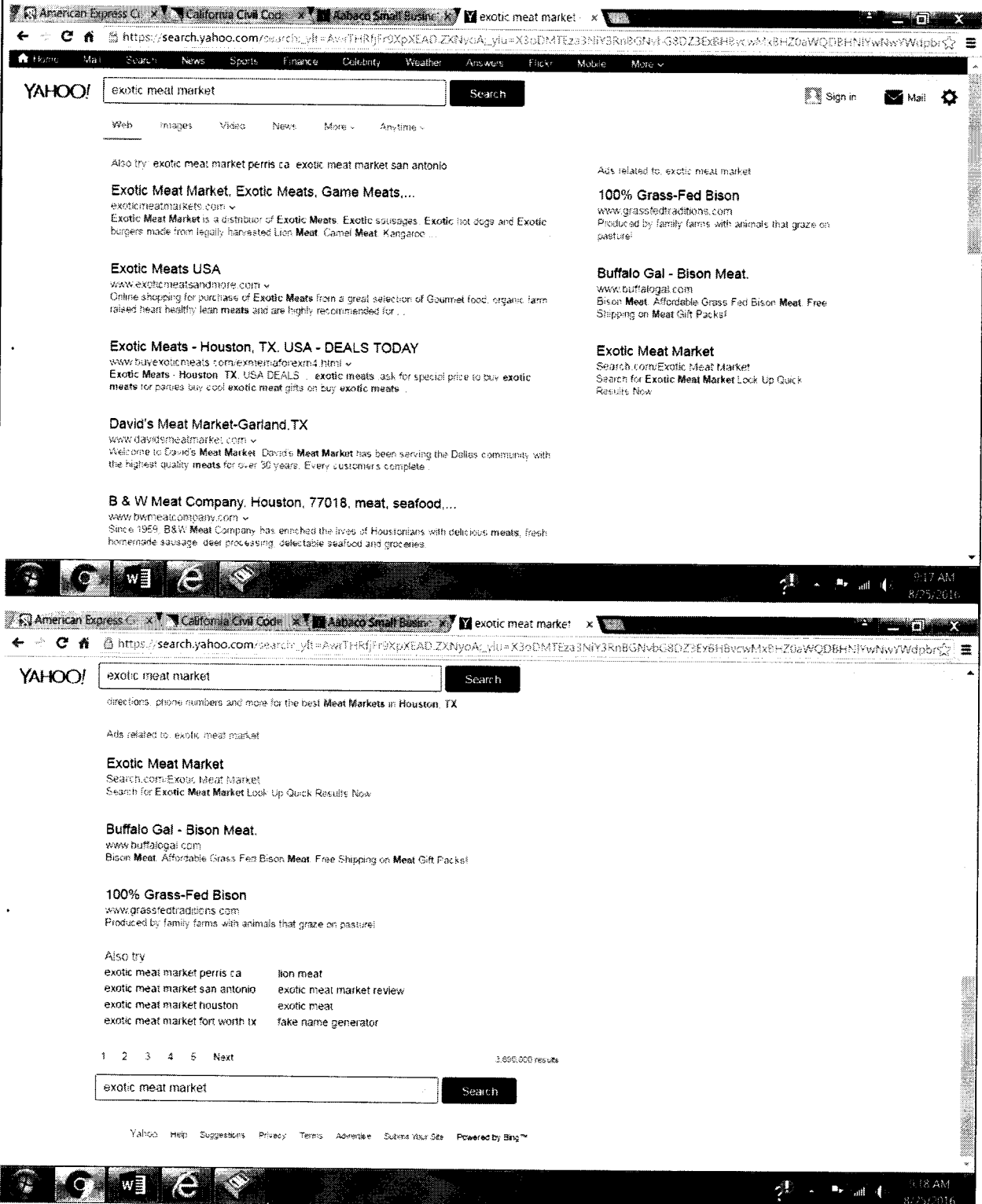
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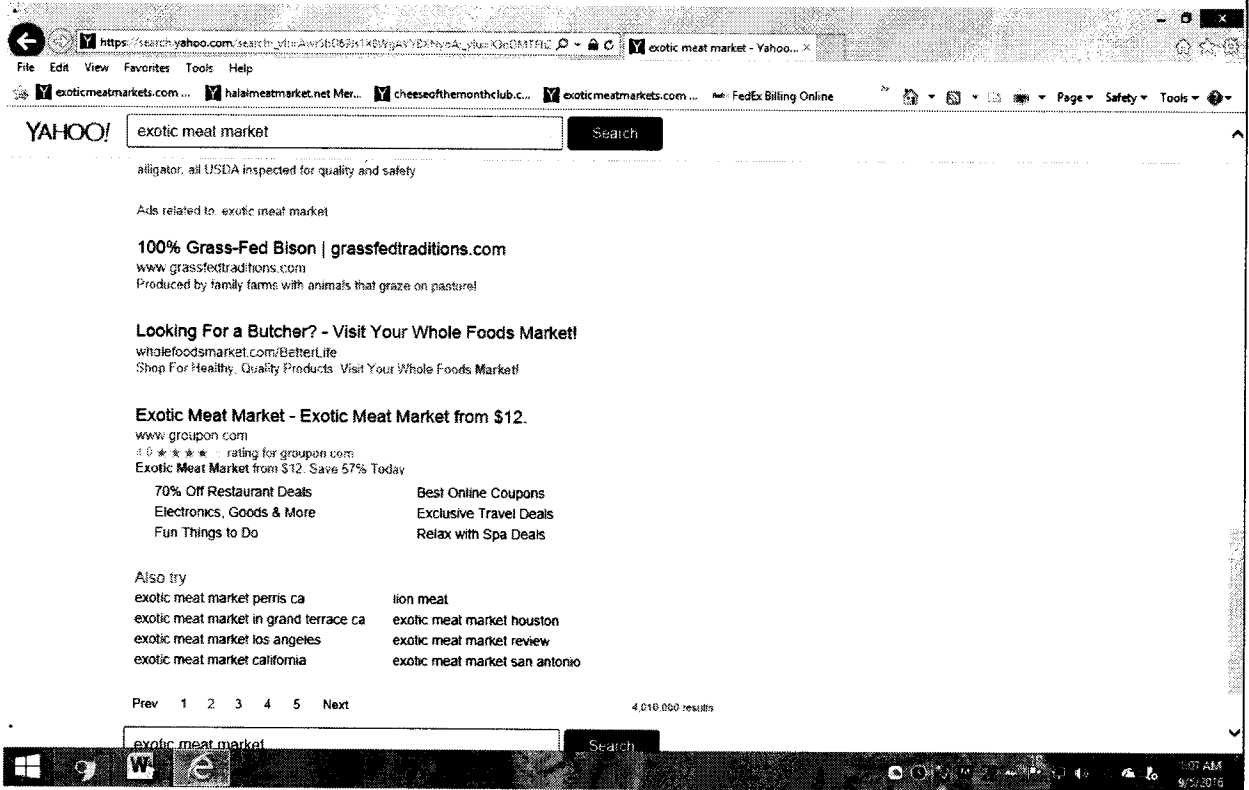
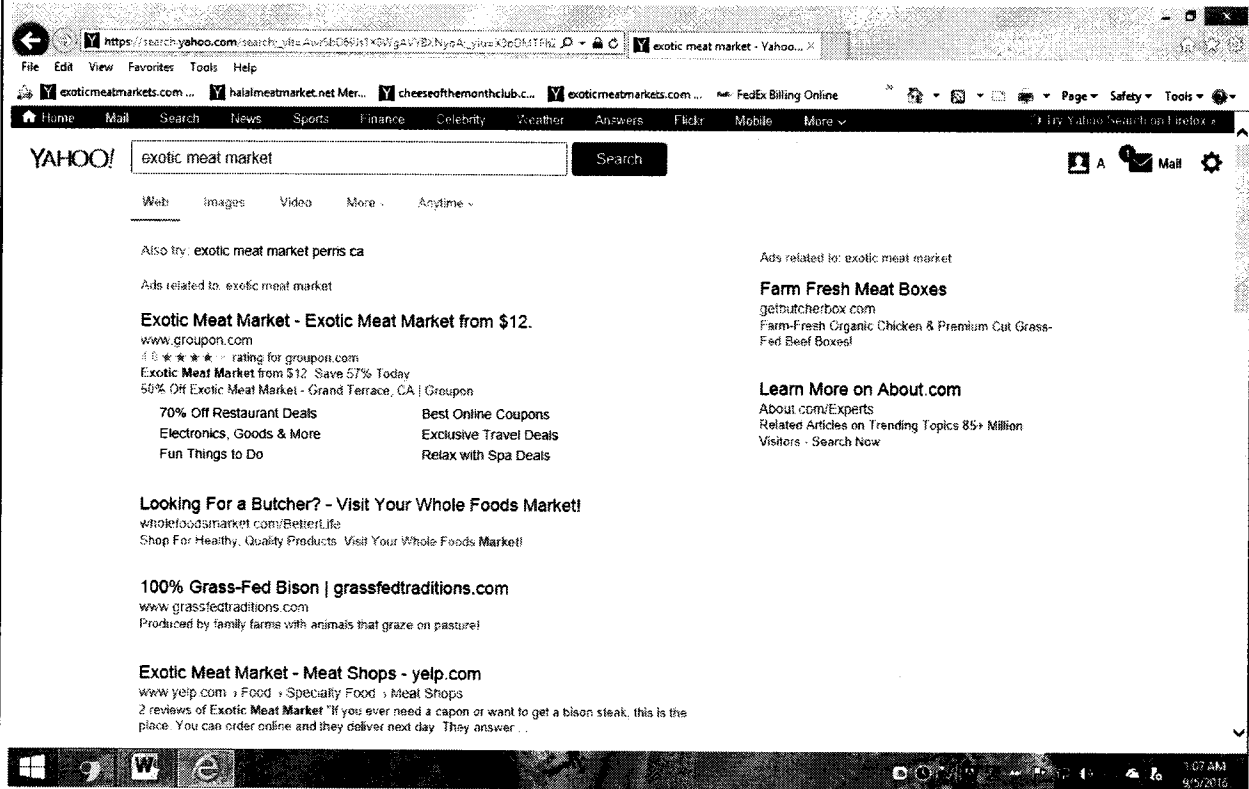
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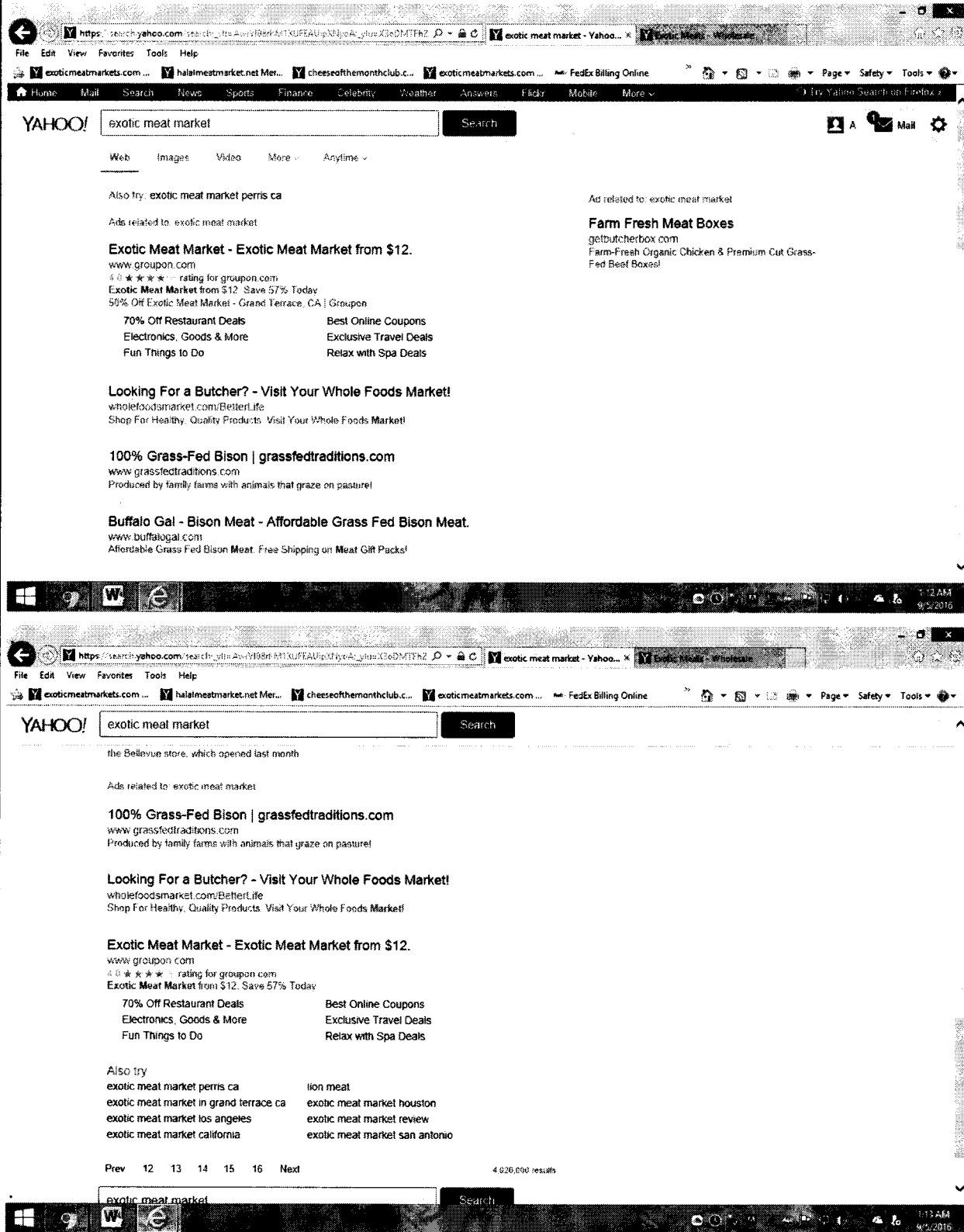
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1 The image shows a screenshot of a Yahoo! search results page for the query 'exotic meat market'. The page is displayed in a web browser window with multiple tabs open. The search results are organized into two columns. The left column contains several search results, including 'Roseville Meat Company - Modern Old Fashioned Meat...', 'Exotic Meat Market - broadleafgame.net', 'Owner of Chicago Area Exotic Meat Market Sentenced...', 'Products - TISCHLER'S MARKET & DELI', and 'Our Trademarks - Exotic Meat Market - Exotic Hot...'. The right column contains 'Ads related to: exotic meat market', including 'Exotic Meat Market', 'Exotic Meat at Amazon.com', 'Exotic Meat Sale | when.com', and 'Meat Deals | Lobels.com'. At the bottom of the page, there is a navigation bar with links for 'Prev', '14', '15', '16', '17', '18', and 'Next', along with a search bar and a 'Search' button. The page is powered by Bing.

2 **YAHOO!** exotic meat market

3 Web Images Video More Anytime

4 Also try: exotic meat market perris ca

5 **Roseville Meat Company - Modern Old Fashioned Meat...**  
 rosevillemeats.com  
 Extensive line of beef, pork, chicken, lamb, veal, marinated products, and exotic meats such as buffalo and venison. Local, family owned. **Roseville Meat Co.**

6 **Exotic Meat Market - broadleafgame.net**  
 broadleafgame.net/bottermeat.html  
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7 **Owner of Chicago Area Exotic Meat Market Sentenced...**  
 www.fws.gov/bendnotes/regmap.cfm?arskey=11071  
 Richard Czimer, owner of a suburban Chicago exotic meat market was sentenced today in U.S. District Court in Chicago to serve six months in federal prison, pay a \$...

8 **Products - TISCHLER'S MARKET & DELI**  
 tischlersmarket.com/products.htm  
 Products At Tischler's Market & Deli, we offer a great selection of Beef, Lamb, Veal, extensive Homemade goodies, exotic meats, soup meats, sausage, chicken, and more!

9 **Our Trademarks - Exotic Meat Market - Exotic Hot...**  
 exoticmeats-usa.com/ourtrademarks.html  
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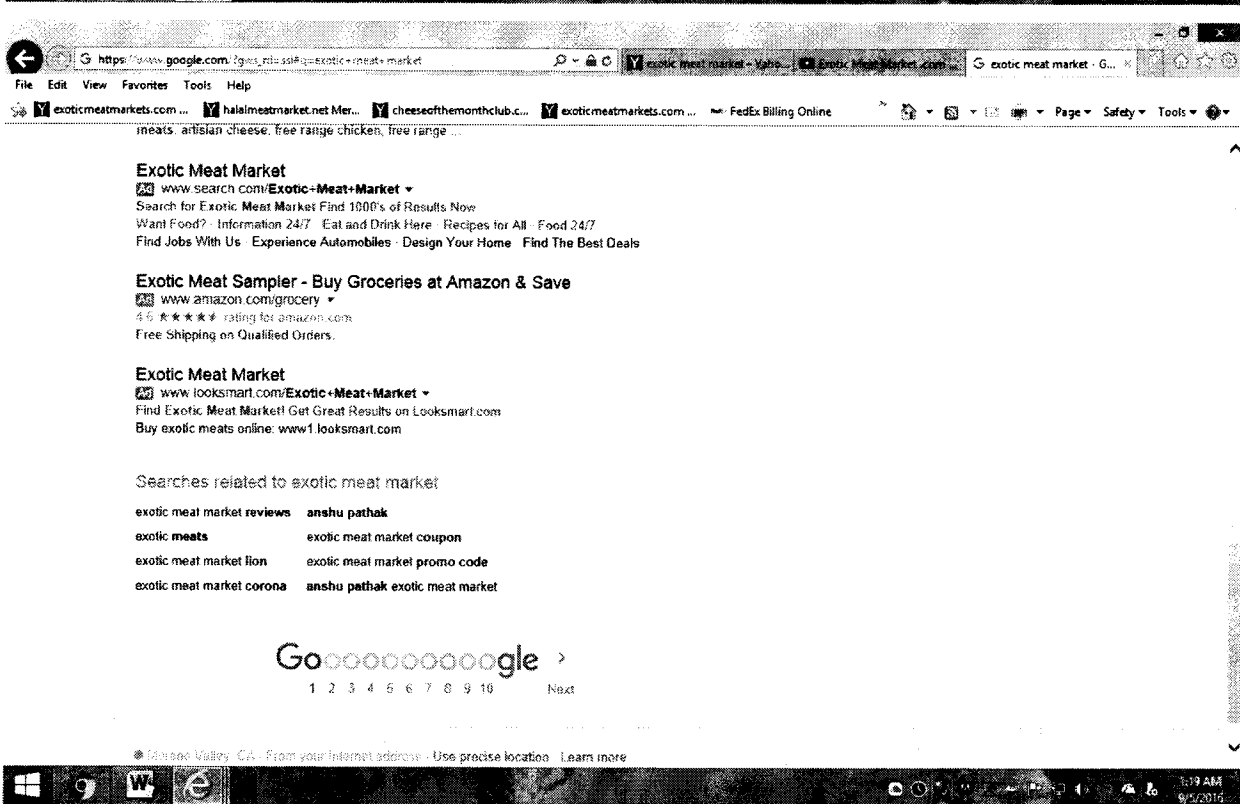
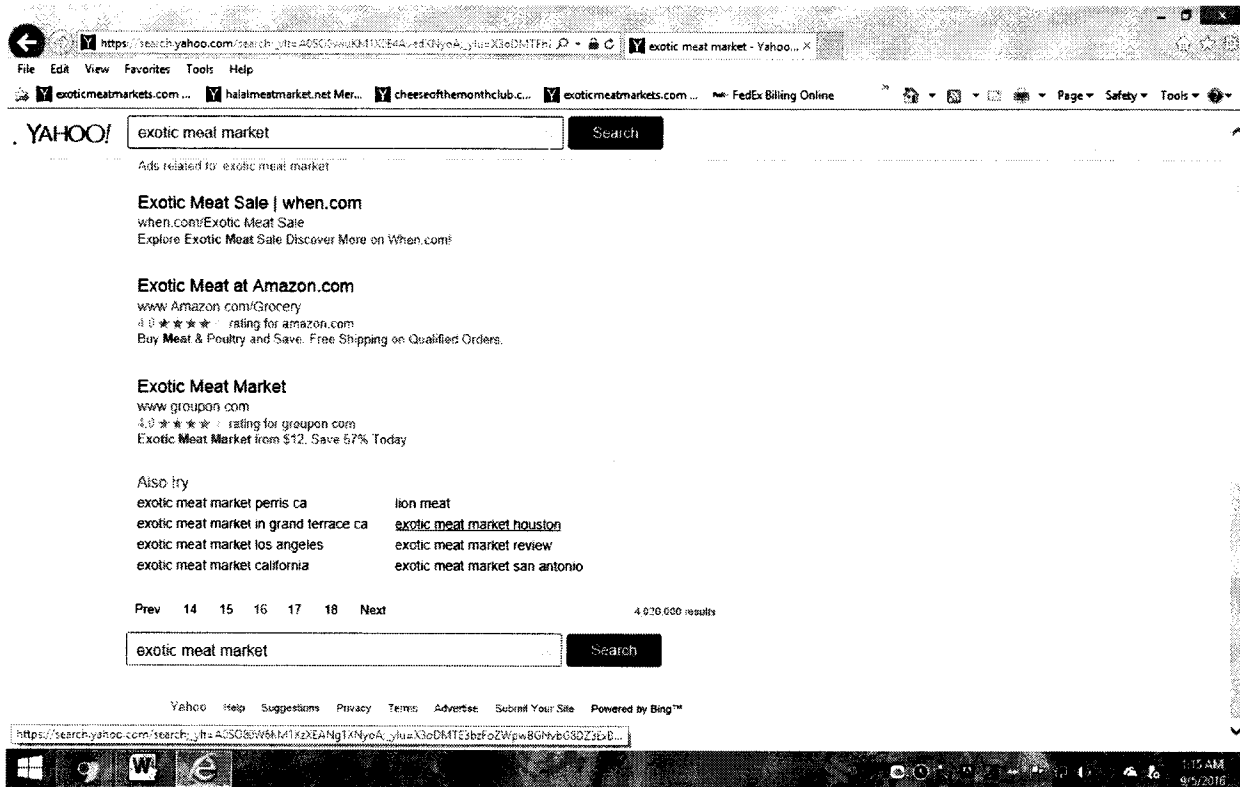
21 exotic meat market los angeles exotic meat market review

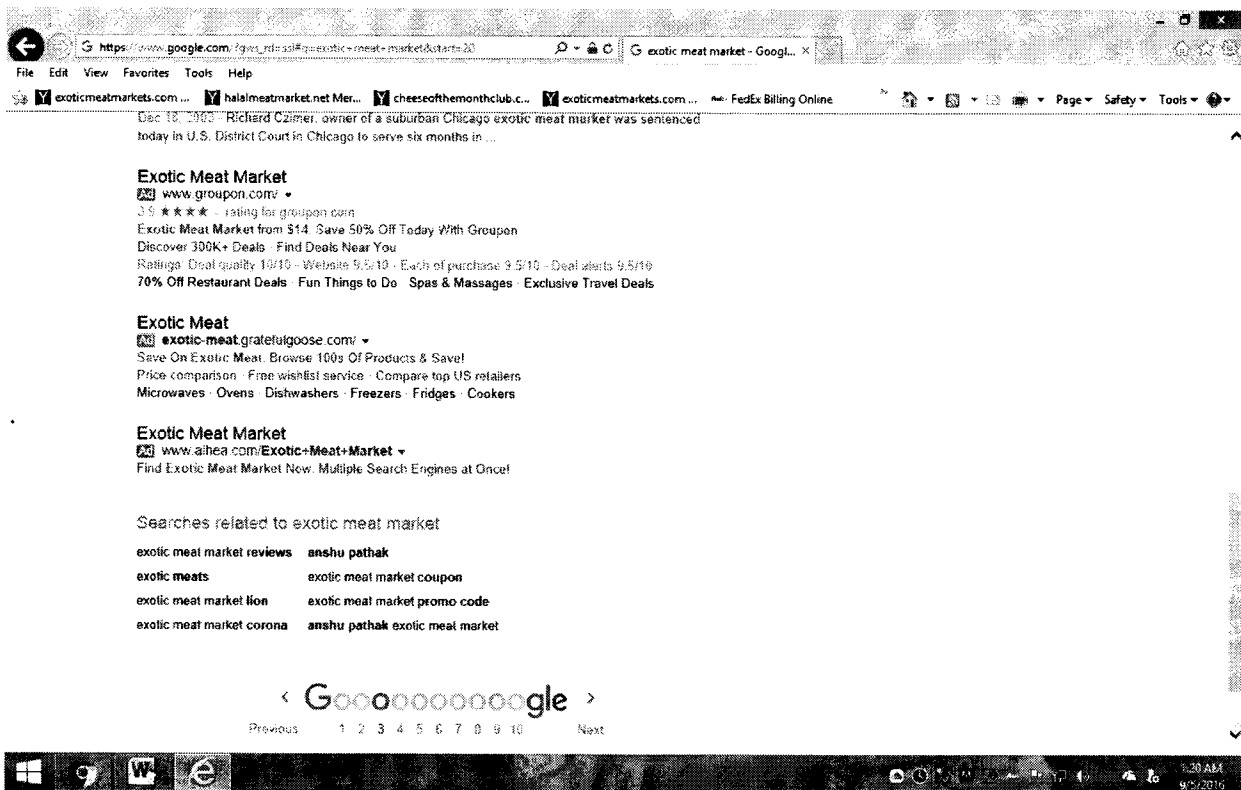
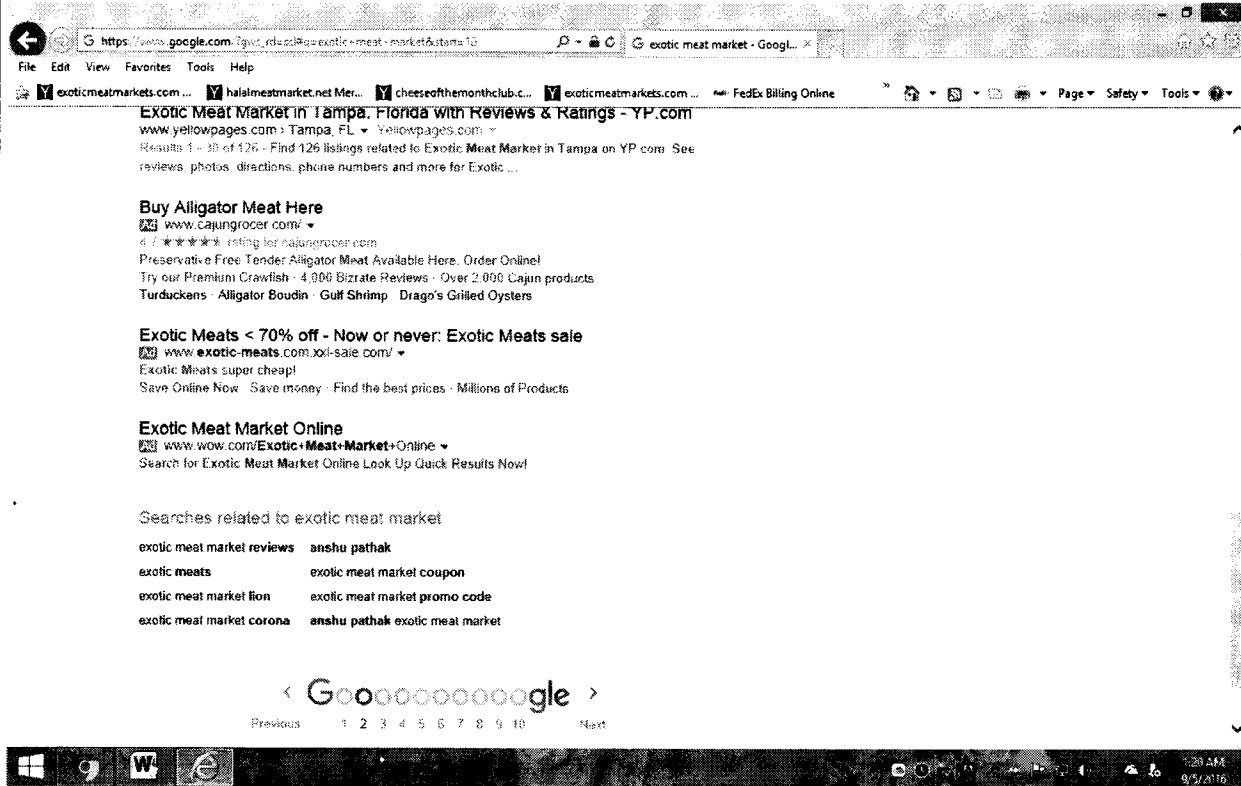
22 exotic meat market california exotic meat market san antonio

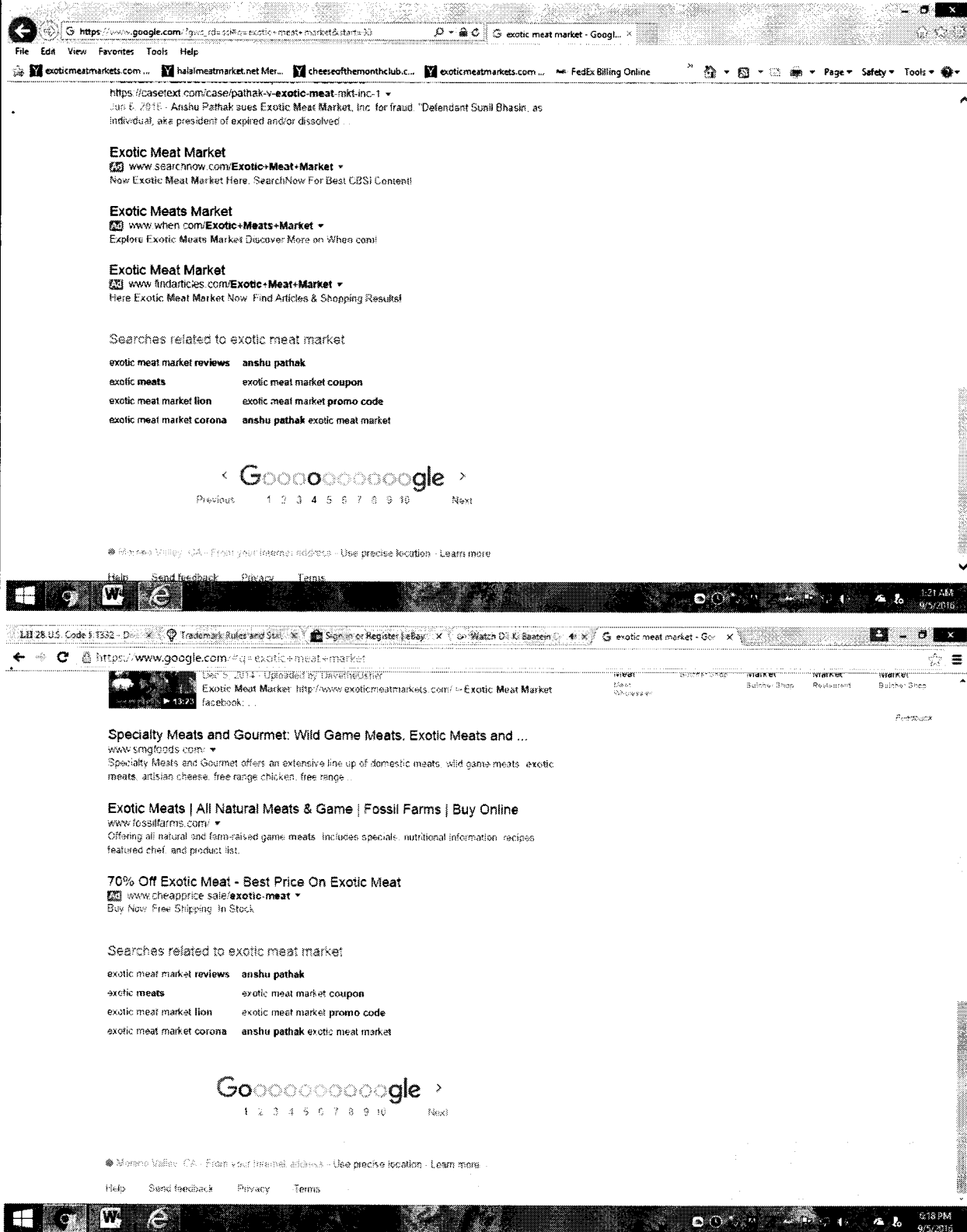
23 Prev 14 15 16 17 18 Next 4,926,699 results

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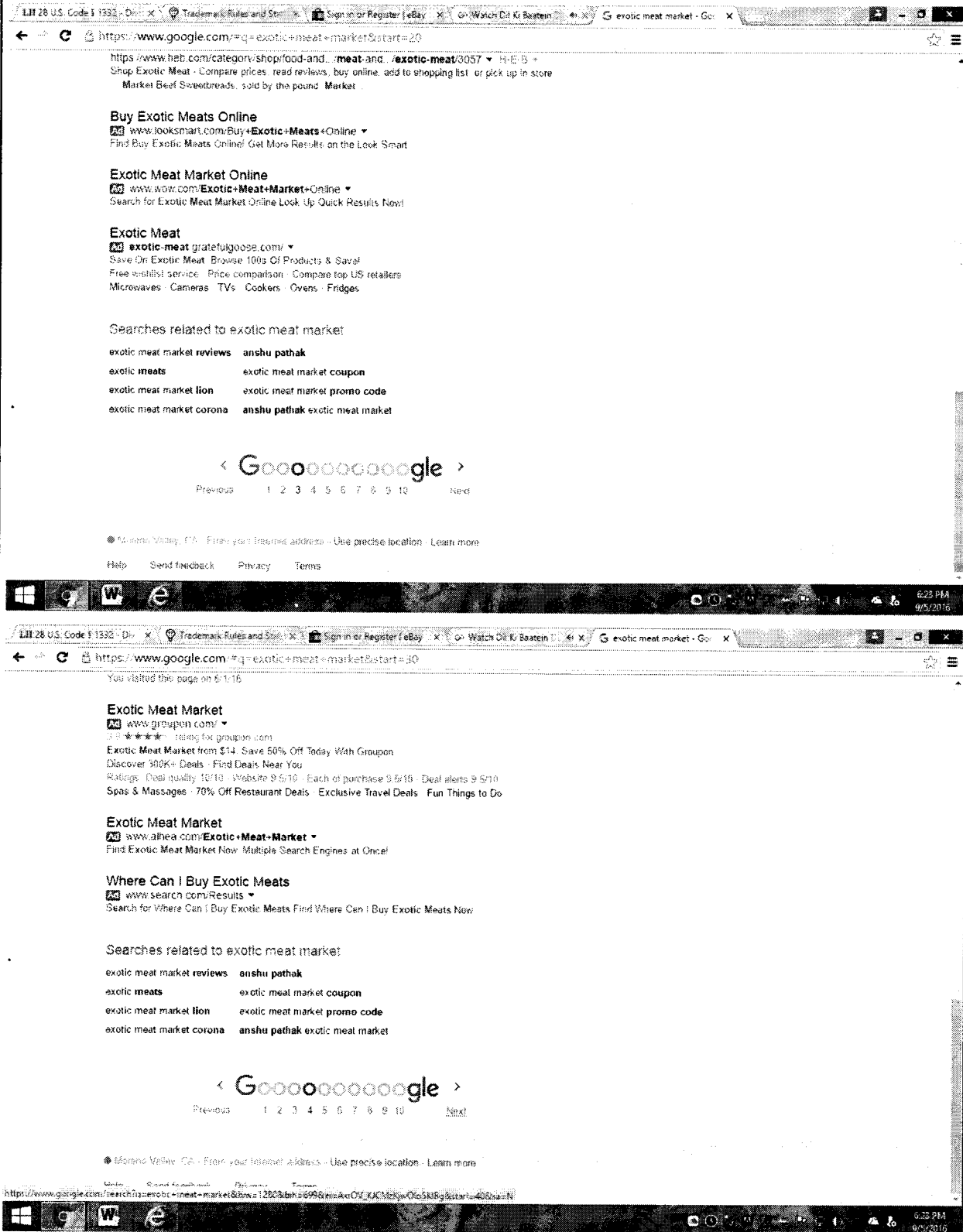
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 84% ★★★★★ 16 REVIEWS  
 Burgers don't have to be made out of beef. At Exotic Meat Market, the patties are often made of anything but—kangaroo, reindeer, and alligator, to name just a few.

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 Village Meat and Wine Voted #1 Gourmet Meat Market By Las Vegas Life Magazine  
 Home: Exotic Meats: Recipes: Company: Contact: Wo zany Australian Kobe Style

**Exotic Meats, Exotic Meat Market, Exotic Meat ...**  
[yhsr-4175972856354.stores.yahoo.net](http://yhsr-4175972856354.stores.yahoo.net) ▾  
 Welcome to Anshu's Exotic Meat Market. Exotic Meat Market by Anshu Pathak created in 1969 is the realization of a dream and a long journey. Traveling and cooking ...

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 Alligator, Kangaroo, Camel, Snake, Elk, Crocodile

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list.com/2015/01/08/anshu\_pathak\_lion\_meat\_exotic\_meat\_diverside.php  
Anshu Pathak owns Exotic Meat Market in Perris, California, which sells a roster of exotic meats that reads more like a zoo tenant list than a menu: there's alligator

**Exotic Meat Market Business Review in Perris, CA - Central...**  
www.bbb.org/.../butcher/exotic-meat-market-in-perris-ca-100092346  
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7. **Blue Apron - \$40 Off | blueapron.com**  
[www.blueapron.com](http://www.blueapron.com)  
 Premium **meats**, sustainable seafood & fresh produce delivered weekly.  
 Blue Apron: Fresh ingredients, Original Recipes, Delivered to You  
 Try it Today How It Works  
 Shop the Market Blue Apron Reviews  
 Our Suppliers On the Menu

8. **100% Grass-Fed Bison | grassfedtraditions.com**  
[www.grassfedtraditions.com](http://www.grassfedtraditions.com)  
 Produced by family farms with animals that graze on pasture!  
 Special Deals & Giveaways - This Week's Sales - Organic Soy-Free Chicken

9. **Farm Fresh Meat Boxes | getbutcherbox.com**  
[getbutcherbox.com](http://getbutcherbox.com)  
 Farm-Fresh Organic Chicken & Premium Cut Grass-Fed Beef Boxes!  
 Get Started - Why Grass Fed - About The Box - Login

10. **Exotic Meat at Amazon.com**  
[www.amazon.com/Grocery](http://www.amazon.com/Grocery)  
 Buy **Meat** & Poultry and Save. Free Shipping on  
 Qualified Orders.  
 Categories: Books, Movies and more

11. Related Searches

12. **Exotic Meat Market California**  
**Exotic Meat Market Houston**  
**Exotic Meats for Sale**  
**Moose Meat for Sale**  
**Wild Game Meat for Sale**  
**Exotic Meats Lion**  
**Moose Meat for Sale USA**  
**Alaska Moose Meat for Sale**

13. Web Results

14. Electronics, Goods & More Exclusive Travel Deals  
 Fun Things to Do Relax with Spa Deals

15. **Blue Apron - \$40 Off | blueapron.com**  
[www.blueapron.com](http://www.blueapron.com)  
 Premium **meats**, sustainable seafood & fresh produce delivered weekly.  
 Blue Apron: Fresh ingredients, Original Recipes, Delivered to You  
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[getbutcherbox.com](http://getbutcherbox.com)  
 Farm-Fresh Organic Chicken & Premium Cut Grass-Fed Beef Boxes!  
 Get Started - Why Grass Fed - About The Box - Login

18. Searches related to **exotic meat market**

19. **Exotic Meat Market California** **Wild Game Meat for Sale**  
**Exotic Meat Market Houston** **Exotic Meats Lion**  
**Exotic Meats for Sale** **Moose Meat for Sale USA**  
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**Exotic Meat at Amazon.com**  
www.amazon.com/Grocery  
Buy Meat & Poultry and Save. Free Shipping on  
Qualified Orders  
Categories: Books, Movies and more

**Meat Processing Supplies**  
www.MeatProcessingProducts.com  
Meat processing, handling & storage equipment  
& supply. Home & business

**Order Exotic Meat | About.com**  
About.com/Order Exotic Meat  
Related Articles on Order Exotic Meat 85+  
Million Visitors - Search Now

Related Searches

**Exotic Meat Market California**  
**Exotic Meat Market Houston**  
**Exotic Meats for Sale**  
**Moose Meat for Sale**  
**Wild Game Meat for Sale**  
**Exotic Meats Lib**  
**Moose Meat for Sale USA**  
**Alaska Moose Meat for Sale**

**Web Results**

**Tampa Steak Company**  
tampasteak.com  
Welcome to Tampa Steak. Tampa Steak Company is a family operated wholesale food  
distributor and retail meat market that is open to the public.

**Our Meats - John's Market**  
www.johnseighmarket.com/our-meats  
John's Elgin Market is a wild game meat market online store and retail deer processing center  
that has been providing quality meats since 1880.

**Gorman's Meat Market**  
gormanmeat.com  
Gorman's Meat Market has been family owned and operated in the Dallas area since 1958.  
We offer some of the finest quality choice and

**Owner of Chicago Area Exotic Meat Market Sentenced to Six**  
www.fws.gov/beltrnotes/regmap.cfm?erskey=11971  
Richard Czirner, owner of a suburban Chicago exotic meat market was sentenced today in  
U.S. District Court in Chicago to serve six months in federal prison, pay a \$...

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Ads related to exoticmeatmarkets.com

**Wild Boar Meat For Sale | SteaksAndGame.com**  
SteaksAndGame.com/Wild-Boar  
Delicious Nutty Meat & Sweet Flavor 100% Natural Raised Wild Boar Meat

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**Exotic Meats USA**  
www.exoticmeatsandmore.com  
Online shopping for purchase of Exotic Meats from a great selection of Gourmet food,  
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[www.exoticmeatsandmore.com](http://www.exoticmeatsandmore.com)  
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<https://www.sitejabber.com/reviews/www.exoticmeatmarkets.com>  
 exoticmeatmarkets.com 33% Categories: Meat 130 West Walnut Street, Unit A 5  
 Perris, CA 92571 Tel: 1-877-398-0141 exoticmeatmarketinc@aol.com

Wild Idea Buffalo Company - Official Home.  
 Ad: [WildIdeaBuffalo.com](http://WildIdeaBuffalo.com)  
 Official Home. Top Provider of 100% Grass-fed, Free-ranging Bison Meat.  
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Related searches  
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 Search for Alligator Meat Find Expert Advice on About.com  
 Buy Alligator Meat Online Alligator Meat For Sale

**Buy Exotic Game Meat - Bison, Venison, Wild Boar, Elk...**  
[MarkFoods.com/exotic-game-meat](http://MarkFoods.com/exotic-game-meat)  
 Bison, Venison, Wild Boar, Elk. Most game meats available in bulk  
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[www.exoticmeatsandmore.com](http://www.exoticmeatsandmore.com)  
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## DEFENDANT YAHOO AND ASSOCIATES BLOCKED PLAINTIFF'S ON-LINE RETAIL STORE FROM INTERNET

68. Defendant YAHOO and their associates blocked Plaintiff's on-line retail store after Plaintiff gave Trademark Infringement Notice to advertisers of Defendant YAHOO.

**DEFENDANT YAHOO GAVE NOTICE TO TERMINATE PLAINTIFF'S ONLINE  
RETAIL STORES**

69. Defendant YAHOO gave notice to terminate Plaintiff's on-line retail stores after Plaintiff gave Trademark Infringement Notice to advertisers of Defendant YAHOO. [All Exhibits]

70. Yahoo claims that the advertiser is responsible for ensuring that use of keywords and ad content, including trademarks and logos, does not infringe or violate the intellectual property rights of others.

71. Yahoo claims that they appreciate the importance of trademarks and takes allegations of trademark infringement seriously. Yahoo prohibits infringement of trademarks and other intellectual property by advertisers. If a trademark owner is concerned that their trademark is being used improperly in ad text, the owner should first contact the advertiser directly to address the issue. If dissatisfied with the outcome, the owner may also wish to contact Yahoo. Please note that Yahoo is not a mediator.

**FIRST CAUSE OF ACTION**

**[Unjust Enrichment]**

**(Against All Defendants)**

72. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in above paragraphs, inclusive.

73. Plaintiff is the owner of Trademark, "EXOTIC MEAT MARKET." [Exhibit 1]

74. Plaintiff is the owner of Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB."  
[Exhibit 2]

75. Defendants own search engines.

76. Advertisers bids on "Key Words" on Defendants search engines to sell their products and services.

77. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List" without knowledge of Plaintiff.

78. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List" without permission of Plaintiff.

1 79. Defendant YAHOO added Plaintiff's Trademarks as "Key Word" on their advertiser's  
2 "bidding list" without permission of Plaintiff.

3 80. Defendant MICROSOFT added Plaintiff's Trademarks as "Key Word" on their  
4 advertiser's "bidding list" without permission of Plaintiff.

5 81. By reasons of the foregoing facts, Plaintiff has suffered financial losses.

6 82. By reasons of the foregoing facts, Plaintiff's Trademarks are infringed.

7 83. By reasons of the foregoing facts, Plaintiff's Trademarks are diluted.

8 84. By reasons of the foregoing facts, Plaintiff has lost sales in past.

9 85. By reasons of the foregoing facts, Defendants and each of them, have become unjustly  
10 enriched at the expense of Plaintiff by profiting from the use of Plaintiff's Trademark and  
11 by realizing monetary gain from their unauthorized use of said mark.

12 86. A person who has been unjustly enriched at the expense of another is required to make  
13 restitution to the other.

14 87. Defendants and each of them have become unjustly enriched in an amount that cannot be  
15 precisely ascertained at this time, but will be ascertained according to proof at trial.

## 16 **SECOND CAUSE OF ACTION**

### 17 **[Demand for Accounting]**

### 18 **(Against All Defendants)**

19 88. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in  
20 above paragraphs, inclusive.

21 89. Plaintiff is the owner of Trademark, "EXOTIC MEAT MARKET." [Exhibit 1]

22 90. Plaintiff is the owner of Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB."  
23 [Exhibit 2]

24 91. Defendants own search engines.

25 92. Advertisers bids on "Key Words" on Defendants search engines to sell their products and  
services.

93. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
without knowledge of Plaintiff.

94. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
without permission of Plaintiff.

1 95. Defendant YAHOO added Plaintiff's Trademarks as "Key Word" on their advertiser's  
2 "bidding list" without permission of Plaintiff.

3 96. Defendant MICROSOFT added Plaintiff's Trademarks as "Key Word" on their  
4 advertiser's "bidding list" without permission of Plaintiff.

5 97. By reasons of the foregoing facts, Plaintiff has suffered financial losses.

6 98. By reasons of the foregoing facts, Plaintiff's Trademarks are infringed.

7 99. By reasons of the foregoing facts, Plaintiff's Trademarks are diluted.

8 100. By reasons of the foregoing facts, Plaintiff has lost sales in past.

9 101. By reasons of the foregoing facts, Defendants and each of them, have become unjustly  
10 enriched at the expense of Plaintiff by profiting from the use of Plaintiff's Trademark and  
11 by realizing monetary gain from their unauthorized use of said mark.

12 102. A person who has been unjustly enriched at the expense of another is required to make  
13 restitution to the other.

14 103. As seen above, Plaintiff has an interest in all of the money that is generated from the  
15 exploitation of Plaintiff's Trademarks.

16 104. Plaintiff is informed and believes that Defendants have generated an undetermined, yet  
17 substantial amount of money, due to commercial exploitation of Plaintiff's Trademarks.

18 105. The amount of money due from Defendants is unknown to Plaintiff and cannot be  
19 ascertained without an accounting of all the Defendant's financial records related to the  
20 sales generated through their infringing activities.

21 106. As a result of Defendant's actions, or lack thereof, Plaintiff has been damaged in an  
22 amount to be proven after an accounting has been conducted. Accordingly, Plaintiff  
23 hereby requests that the Court order an accounting of all of Defendant's financial records  
24 related to the infringing activities in order to determine the sums rightfully due to  
25 Plaintiff. Furthermore, Plaintiff demands that those sums be paid to it.

### **THIRD CAUSE OF ACTION**

#### **[Constructive Trust]**

#### **(Against All Defendants)**

107. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in  
above paragraphs, inclusive.

108. Plaintiff is the owner of Trademark, "EXOTIC MEAT MARKET." [Exhibit 1]

109. Plaintiff is the owner of Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB."  
[Exhibit 2]

110. Defendants own search engines.

111. Advertisers bids on "Key Words" on Defendants search engines to sell their products  
and services.

112. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
without knowledge of Plaintiff.

113. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
without permission of Plaintiff.

114. Defendant YAHOO added Plaintiff's Trademarks as "Key Word" on their advertiser's  
"bidding list" without permission of Plaintiff.

115. Defendant MICROSOFT added Plaintiff's Trademarks as "Key Word" on their  
advertiser's "bidding list" without permission of Plaintiff.

116. By reasons of the foregoing facts, Plaintiff has suffered financial losses.

117. By reasons of the foregoing facts, Plaintiff's Trademarks are infringed.

118. By reasons of the foregoing facts, Plaintiff's Trademarks are diluted.

119. By reasons of the foregoing facts, Plaintiff has lost sales in past.

120. By reasons of the foregoing facts, Defendants and each of them, have become unjustly  
enriched at the expense of Plaintiff by profiting from the use of Plaintiff's Trademark and  
by realizing monetary gain from their unauthorized use of said mark.

121. A person who has been unjustly enriched at the expense of another is required to make  
restitution to the other.

122. Plaintiff is informed and believes that Defendants have generated an undetermined, yet  
substantial amount of money, due to commercial exploitation of Plaintiff's Trademarks.

123. As seen above, Plaintiff is entitled to all of the money that is generated from the  
infringing activities. Plaintiff has not given its consent for Defendants to utilize its  
Trademarks. Such monies should be placed in a constructive trust until such time as this  
matter is resolved.

**FORTH CAUSE OF ACTION**

**[Permanent Injunction]**

**(Against All Defendants)**



1 124. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in  
2 above paragraphs, inclusive.

3 125. Plaintiff is the owner of Trademark, "EXOTIC MEAT MARKET." [Exhibit 1]

4 126. Plaintiff is the owner of Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB."  
5 [Exhibit 2]

6 127. Defendants own search engines.

7 128. Advertisers bids on "Key Words" on Defendants search engines to sell their products  
8 and services.

9 129. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
10 without knowledge of Plaintiff.

11 130. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List"  
12 without permission of Plaintiff.

13 131. Defendant YAHOO added Plaintiff's Trademarks as "Key Word" on their advertiser's  
14 "bidding list" without permission of Plaintiff.

15 132. Defendant MICROSOFT added Plaintiff's Trademarks as "Key Word" on their  
16 advertiser's "bidding list" without permission of Plaintiff.

17 133. By reasons of the foregoing facts, Plaintiff has suffered financial losses.

18 134. By reasons of the foregoing facts, Plaintiff's Trademarks are infringed.

19 135. By reasons of the foregoing facts, Plaintiff's Trademarks are diluted.

20 136. By reasons of the foregoing facts, Plaintiff has lost sales in past.

21 137. By reasons of the foregoing facts, Defendants and each of them, have become unjustly  
22 enriched at the expense of Plaintiff by profiting from the use of Plaintiff's Trademark and  
23 by realizing monetary gain from their unauthorized use of said mark.

24 138. A person who has been unjustly enriched at the expense of another is required to make  
25 restitution to the other.

139. At this time Defendants continue to engage in the aforementioned infringing activity.

140. These actions on behalf of Defendants are wrongful and should be enjoined in that they  
have caused, and continue to cause, Plaintiff great and irreparable injury.

141. Plaintiff has no other plain, speedy and adequate remedy at law, and the injunctive relief  
prayed for below is necessary and appropriate at this time to prevent irreparable loss to  
Plaintiff's interests.

**FIFTH CAUSE OF ACTION**

**[Trademark Infringement 15 U.S.C. § 1114 (1) (a)]**

**(Against All Defendants)**

142. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in above paragraphs, inclusive.

143. Plaintiff is the owner of Trademark, "EXOTIC MEAT MARKET." [Exhibit 1]

144. Plaintiff is the owner of Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB." [Exhibit 2]

145. Defendants own search engines.

146. Advertisers bids on "Key Words" on Defendants search engines to sell their products and services.

147. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List" without knowledge of Plaintiff.

148. Defendants add Plaintiff's Trademarks as "Key Words" to advertiser's "Bidding List" without permission of Plaintiff.

149. Defendant YAHOO added Plaintiff's Trademarks as "Key Word" on their advertiser's "bidding list" without permission of Plaintiff.

150. Defendant MICROSOFT added Plaintiff's Trademarks as "Key Word" on their advertiser's "bidding list" without permission of Plaintiff.

151. By reasons of the foregoing facts, Plaintiff has suffered financial losses.

152. By reasons of the foregoing facts, Plaintiff's Trademarks are infringed.

153. By reasons of the foregoing facts, Plaintiff's Trademarks are diluted.

154. By reasons of the foregoing facts, Plaintiff has lost sales in past.

155. Defendants continue to add Plaintiff's Trademarks as "Key Word" without knowledge of their advertisers and infringe Plaintiff's Trademark.

156. Defendants infringe Plaintiff's Trademark for their financial benefits.

157. Because defendant's action in using Plaintiff's "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG OF THE MONTH CLUB" marks as key word triggers was intentional and in bad faith, the court should enter an award of enhanced damages under 15 U.S.C. § 1117 (a) (3) in an amount up to three times the actual damages.

1 158. In addition, because Plaintiff's remedies under 15 U.S.C. § 1117 (a), while necessary,  
2 are not sufficient to fully protect Plaintiff's continuing interest in preserving its marks  
3 against future infringements by Defendant, Plaintiff is entitled to an injunction against  
4 Defendant's use in the future of Plaintiff's registered "EXOTIC MEAT MARKET" and  
5 "EXOTIC HOT DOG OF THE MONTH CLUB" marks, or any colorable imitation or  
6 confusingly similar variation of Plaintiff's "EXOTIC MEAT MARKET" and "EXOTIC  
7 HOT DOG OF THE MONTH CLUB" marks as keyword triggers for any advertisement  
8 for the sale of any product other than genuine "EXOTIC MEAT MARKET" and  
9 "EXOTIC HOT DOG OF THE MONTH CLUB" products.

10 159. Plaintiff is also entitled to an injunction prohibiting any other infringing use such as in  
11 or as the title for any advertisement for the sale of any product other than genuine  
12 "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG OF THE MONTH CLUB"  
13 products.

14 160. Plaintiff is the registered owner of the "EXOTIC MEAT MARKET" and "EXOTIC  
15 HOT DOG OF THE MONTH CLUB" marks. [Exhibit 1 and 2]

16 161. Plaintiff exclusively uses its "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG  
17 OF THE MONTH CLUB" marks for his products and services. [Exhibit 1 and 2]

18 162. As of September 6, 2006 Defendant YAHOO did not stop direct and indirect  
19 infringement of Plaintiff's Trademarks after giving them Notice to "CEASE AND  
20 DESIST".

21 163. Plaintiff has lost business revenue due to the acts of Defendants.

22 164. Plaintiff has not authorized Defendants to use his "EXOTIC MEAT MARKET" and  
23 "EXOTIC HOT DOG OF THE MONTH CLUB" marks to sell their advertisements on  
24 the Internet.

25 165. Defendants continued to infringe Plaintiff's Trademark by placing bids as Key Word for  
Plaintiff's Trademark, "EXOTIC MEAT MARKET" without knowledge of advertisers  
competing with Plaintiff.

166. Defendants continued to infringe Plaintiff's Trademark by placing bids as Key Word for  
Plaintiff's Trademark, "EXOTIC HOT DOG OF THE MONTH CLUB" without  
knowledge of advertisers competing with Plaintiff.

1 167. Plaintiff has not authorized Defendants to use his “EXOTIC MEAT MARKET” and  
2 “EXOTIC HOT DOG OF THE MONTH CLUB” marks to sell their advertisers as “Key  
3 Words.” [Exhibit 1 and 2]

4 168. Defendant’s activities infringe Plaintiff’s Trademark Rights in Violation of §32 (1) of  
5 Lanham Act, 15 U.S.C. § 1114 (1).

6 169. Defendants are thus liable under 15 U.S.C. § 1114 (1) (a) for infringement of Plaintiff’s  
7 registered Trademarks. [Exhibit 1 and 2]

8 170. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary  
9 damage, loss and injury, to an extent not yet ascertained.

10 171. Defendant’s activities infringe Plaintiff’s Trademark Rights in Violation of §32 (1) of  
11 Lanham Act, 15 U.S.C. § 1114 (1).

12 172. Defendants are thus liable under 15 U.S.C. § 1114 (1) (a) for infringement of Plaintiff’s  
13 registered Trademarks. [Exhibit 1 and 2]

14 173. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary  
15 damage, loss and injury, to an extent not yet ascertained.

16 **SIXTH CAUSE OF ACTION**

17 **["Passing Off" Under the Lanham Act -15 U.S.C. § 1125 (a)]**

18 **(Against All Defendants)**

19 174. Plaintiff alleges and incorporates by reference each and every allegation set forth in  
20 above paragraphs, inclusive.

21 175. Defendant are thus liable under 15 U.S.C. § 1125(a) for unfair competition by its uses of  
22 Plaintiff’s registered Trademarks. [Exhibit 1 and 2]

23 176. Pursuant to 15 U.S.C. § 1117 (a), Plaintiff is entitled to recover Defendant’s profits and  
24 the cost of the action.

25 177. Because defendants action in using Plaintiff’s Trademarks was intentional and in bad  
faith, the court should enter an award of enhanced damages under 15 U.S.C. § 1117 (a)  
(3) in an amount up to three times the actual damages.

178. This case is an exceptional case under 15 U.S.C. § 1117 (a) (3) and Plaintiff should be  
awarded its reasonable attorney fees.

179. In addition, because Plaintiff’s remedies under 15 U.S.C. § 1117 (a), while necessary,  
are not sufficient to fully protect Plaintiff’s continuing interest in preserving its marks

1 against future infringements by Defendant, Plaintiff is entitled to an injunction against  
 2 Defendant's use in the future of Plaintiff's registered Trademarks, or any colorable  
 3 imitation or confusingly similar variation of Plaintiff's Trademarks as keyword triggers  
 4 for any advertisement for the sale of any product other than genuine Plaintiff's products.  
 5 Plaintiff is also entitled to an injunction prohibiting any other infringing use such as in or  
 6 as the title for any advertisement for the sale of any product other than genuine Plaintiff's  
 7 products.

8 180. Defendants aforesaid acts of infringement have caused Plaintiff sustain monetary  
 9 damage, loss and injury, to an extent not yet ascertained.

### 10 **SEVENTH CAUSE OF ACTION**

#### 11 **[Trademark Dilution - 15 U.S.C. § 1125 (c)]**

#### 12 **(Against All Defendants)**

13 181. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in  
 14 above paragraphs, inclusive.

15 182. Plaintiff's "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG OF THE MOTH  
 16 CLUB" are famous mark under the common law and under the factors described for  
 17 protection against dilution in 15 U.S.C. § 1125(c)(2)(A) and transcend the **specific**  
 18 **classes of goods and services for which Plaintiff has registered** its "EXOTIC MEAT  
 19 MARKET" and "EXOTIC HOT DOG OF THE MONTH CLUB" marks.

20 [Exhibit 1 and 2]

21 183. Defendants use of plaintiff's "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG  
 22 OF THE MONTH CLUB" marks are likely to cause dilution by blurring of Plaintiff's  
 23 famous "EXOTIC MEAT MARKET" and "EXOTIC HOT DOG OF THE MONTH  
 24 CLUB" marks under 15 U.S.C. § 1125(c)(2)(B). [Exhibit 1 and 2]

25 184. Pursuant to 15 U.S.C. § 1125(c) (1) and (5). Plaintiff is entitled to an injunction against  
 defendant's use in the future of Plaintiff's registered "EXOTIC MEAT MARKET" marks,  
 or any colorable imitation or confusingly similar variation of plaintiff's "EXOTIC MEAT  
 MARKET" marks, as keyword triggers for any advertisement for the sale of any product  
 other than genuine Plaintiff's products. [Exhibit 1 and 2]

1 185. Plaintiff is also entitled to an injunction prohibiting any other use that dilutes plaintiff's  
2 "EXOTIC MEAT MARKET" marks such as in or as the title for any advertisement for  
the sale of any product other than genuine Plaintiff's products.

3 186. In addition, because, on information and belief, Defendant first placed bids for Plaintiff's  
4 "EXOTIC HOT DOG OF THE MONTH CLUB" Trademark in commerce on or after  
5 December 30, 2013 and because Defendant, willfully intended to trade on the recognition  
6 of plaintiff's famous "EXOTIC MEAT MARKET" mark pursuant to 15 U.S.C. § 1125(5)  
(A) and (B) (i), Plaintiff is also entitled to the remedies set forth in 15 U.S.C. § 1117(a).

7 187. In addition, because, on information and belief, Defendant first placed bids for Plaintiff's  
8 "EXOTIC MEAT MARKET" Trademark in commerce on or after December 30, 2014  
9 and because Defendant, willfully intended to trade on the recognition of plaintiff's  
10 famous "EXOTIC MEAT MARKET" mark pursuant to 15 U.S.C. § 1125(5) (A) and (B)

11 188. Plaintiff is also entitled to the remedies set forth in 15 U.S.C. § 1117(a).

12 189. Under 15 U.S.C. § 1117(a), Plaintiff is entitled to recover Defendant's profits and the  
costs of the action.

13 190. Because defendant's actions in using Plaintiff's registered marks as keyword triggers  
14 was intentional and in bad faith, the court should enter an award of enhanced damages  
15 under 15 U.S.C. § 1117(a) (3) in an amount up to three times the actual damages. [All  
Exhibits]

16 191. This case is an exceptional case under 15 U.S.C. § 1117 (a) (3) and Plaintiff should be  
17 awarded its reasonable attorney fees.

#### 18 **EIGHTH CAUSE OF ACTION**

19 **[Cybersquatting in violation of the Lanham Act § 43(d), 15 U.S.C. § 1125 (d)]**

20 **(Against All Defendants)**

21 192. Because defendant's actions in using Plaintiff's registered marks was intentional and in  
22 bad faith, the court should enter an award of enhanced damages under 15 U.S.C. §  
1117(a) (3) in an amount up to three times the actual damages. [All Exhibits]

23 193. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in  
above paragraphs, inclusive.

24 194. Plaintiff is the registered owner of the "EXOTIC MEAT MARKET" and "EXOTIC  
25 HOT DOG OF THE MONTH CLUB" marks. [Exhibit 1 and 2]



1 195. Plaintiff exclusively uses its “EXOTIC MEAT MARKET” and “EXOTIC HOT DOG  
2 OF THE MONTH CLUB” marks for his products and services. [Exhibit 1 and 2]

3 196. Defendants are adding plaintiffs exact or virtually the same marks as “Key Words” to  
4 their advertisers “Bidding List” at expense of Plaintiff. [Exhibit 1 and 2]

5 197. Plaintiff exclusively uses its “EXOTIC MEAT MARKET” and “EXOTIC HOT DOG  
6 OF THE MONTH CLUB” marks on his products and services. [Exhibit 1 and 2]

7 198. Defendants are adding Plaintiff’s registered Trademarks “EXOTIC MEAT MARKET”  
8 and “EXOTIC HOT DOG OF THE MONTH CLUB” as “KEY WORD” to their  
9 advertisers “bidding list” is intentional and in bad faith to divert the customers looking  
10 for Plaintiff’s products and services to their advertisers websites to sell their own  
11 products and services.

12 199. As a direct result of Defendants’ actions, Plaintiff has suffered substantial damage, in  
13 amount to be proven at trial.

14 200. Since Defendants’ acts have caused Plaintiff irreparable, ongoing injury of a nature that  
15 cannot be adequately compensated or measured in damages, Plaintiff has no adequate  
16 remedy at law and will suffer immediate and irreparable loss, damage and injury unless  
17 Defendant’s are restrained and enjoined from continuing to engage in such wrongful  
18 conduct.

#### 19 **PRAYER FOR RELIEF**

20 **WHEREFORE**, Plaintiff prays for judgment against Defendants and each of them as follows.

#### 21 **ON THE FIRST CAUSE OF ACTION**

- 22 1. That the court adjudges and decrees that all the Defendants have willfully infringed  
23 Plaintiff’s exclusive rights under trademark law.
- 24 2. That the court orders an independent accountant to conduct an accounting of all  
25 Defendant’s financial records relating to the sales obtained through the exploitation of  
Plaintiff’s Trademarks in order to determine the sums of money owed to Plaintiff;
3. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to  
Plaintiff;
4. That the defendants, and those acting in concert with them, be permanently enjoined from  
engaging in further acts of infringing Plaintiff’s Trademarks. [Exhibit 1 and 2]

- 1 5. That the defendants, and those acting in concert with them, be permanently enjoined from  
2 selling any products carrying any designation resembling Plaintiff's Trademarks.  
3 [Exhibit 1 and 2]
- 4 6. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of \$
- 5 20 Million.
- 6 7. That Defendants disgorge all profits derived from their wrongful conduct;
- 7 8. Interest at the maximum legal rate;
- 8 9. All reasonable attorney's fees and costs incurred herein;
- 9 10. For treble damages according to proof at trial;
- 10 11. That the court grants such other, further, and different relief as the Court deems just and  
11 proper under the circumstances.

**ON THE SECOND CAUSE OF ACTION**

- 12 1. That the court adjudges and decrees that all the Defendants have willfully infringed  
13 Plaintiff's exclusive rights under trademark law.
- 14 2. That the court orders an independent accountant to conduct an accounting of all  
15 Defendant's financial records relating to the sales obtained through the exploitation of  
16 Plaintiff's Trademarks in order to determine the sums of money owed to Plaintiff;
- 17 3. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to  
18 Plaintiff;
- 19 4. That the defendants, and those acting in concert with them, be permanently enjoined from  
20 engaging in further acts of infringing Plaintiff's Trademarks. [Exhibit 1 and 2]
- 21 5. That the defendants, and those acting in concert with them, be permanently enjoined from  
22 selling any products carrying any designation resembling Plaintiff's Trademarks.  
23 [Exhibit 1 and 2]
- 24 6. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of \$
- 25 20 Million.
7. That Defendants disgorge all profits derived from their wrongful conduct;
8. Interest at the maximum legal rate;
9. All reasonable attorney's fees and costs incurred herein;
10. For treble damages according to proof at trial;

11. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

**ON THE THIRD CAUSE OF ACTION**

1. That the court adjudges and decrees that all the Defendants have willfully infringed Plaintiff's exclusive rights under trademark law.
2. That the court orders an independent accountant to conduct an accounting of all Defendant's financial records relating to the sales obtained through the exploitation of Plaintiff's Trademarks in order to determine the sums of money owed to Plaintiff;
3. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to Plaintiff;
4. That the defendants, and those acting in concert with them, be permanently enjoined from engaging in further acts of infringing Plaintiff's Trademarks. [Exhibit 1 and 2]
5. That the defendants, and those acting in concert with them, be permanently enjoined from selling any products carrying any designation resembling Plaintiff's Trademarks. [Exhibit 1 and 2]
6. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of \$ 20 Million.
7. That Defendants disgorge all profits derived from their wrongful conduct;
8. Interest at the maximum legal rate;
9. All reasonable attorney's fees and costs incurred herein;
10. For treble damages according to proof at trial;
11. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

**ON THE FORTH CAUSE OF ACTION**

1. That the court adjudges and decrees that all the Defendants have willfully infringed Plaintiff's exclusive rights under trademark law.
2. That the court orders an independent accountant to conduct an accounting of all Defendant's financial records relating to the sales obtained through the exploitation of Plaintiff's Trademarks in order to determine the sums of money owed to Plaintiff;

- 1 3. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to  
2 Plaintiff;
- 3 4. That the defendants, and those acting in concert with them, be permanently enjoined from  
4 engaging in further acts of infringing Plaintiff's Trademarks. [Exhibit 1 and 2]
- 5 5. That the defendants, and those acting in concert with them, be permanently enjoined from  
6 selling any products carrying any designation resembling Plaintiff's Trademarks.  
7 [Exhibit 1 and 2]
- 8 6. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of \$  
9 20 Million.
- 10 7. That Defendants disgorge all profits derived from their wrongful conduct;
- 11 8. Interest at the maximum legal rate;
- 12 9. All reasonable attorney's fees and costs incurred herein;
- 13 10. For treble damages according to proof at trial;
- 14 11. That the court grants such other, further, and different relief as the Court deems just and  
15 proper under the circumstances.

16 **ON THE FIFTH CAUSE OF ACTION**

- 17 1. That Plaintiff be awarded any and all monies gained by Defendants through Defendant's  
18 exploitation of Plaintiff's Trademarks;
- 19 2. That the Defendants, and those acting in concert with them, be permanently enjoined  
20 from engaging in further acts of infringing of Plaintiff's Trademarks;
- 21 3. That the defendants, and those acting in concert with them, be permanently enjoined from  
22 selling any goods or services carrying any designation resembling of Plaintiff's  
23 Trademarks;
- 24 4. That the defendants, and those acting in concert with them, be ordered to account for and  
25 recall any and all other infringing material from all marketing tactics, descriptions, search  
terms, meta-tags, and domain names used to deceive the public, so as to permanently  
remove them from the stream of commerce;
5. That Plaintiff be awarded, actual damages in an amount proven at trial or minimum of \$  
20 Million;
6. Interest at the maximum legal rate;

7. All reasonable attorney's fees and costs incurred herein;
8. For exemplary or punitive damages in an amount appropriate to punish or make an example of Defendants, according to proof at trial;
9. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

**ON THE SIXTH CAUSE OF ACTION**

1. That the court orders an independent accountant to conduct an accounting of all Defendant's financial records relating to the sales obtained through the exploitation of Plaintiff's Trademarks in order to determine the sums of money owed to Plaintiff;
2. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to Plaintiff;
3. That Plaintiff be awarded, actual damages in an amount proven at trial or minimum of \$ 20 Million;
4. Interest at the maximum legal rate;
5. All reasonable attorney's fees and costs incurred herein;
6. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

**ON THE SEVENTH CAUSE OF ACTION**

1. That the court imposes an actual or constructive trust upon Defendants in favor of Plaintiff with respect to all income received by their infringing activities;
2. An award of restitution in an amount greater or equal to Defendants' unjust enrichment order an independent accountant to conduct an accounting of all Defendant's financial records relating to the sales obtained through the exploitation of Plaintiff's Trademarks in order to determine the sums of money owed to Plaintiff;
3. Upon a determination of sums due to Plaintiff, demand is made that those sums be paid to Plaintiff;
4. Interest at the maximum legal rate;
5. All reasonable attorney's fees and costs incurred herein;
6. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

**ON THE EIGHTH CAUSE OF ACTION**

7. That the court adjudges and decrees that all the Defendants have willfully infringed Plaintiff's exclusive rights under trademark law.
8. That the defendants, and those acting in concert with them, be permanently enjoined from engaging in further acts of infringing Plaintiff's Trademarks. [Exhibit 1 and 2]
9. That the defendants, and those acting in concert with them, be permanently enjoined from selling any products carrying any designation resembling Plaintiff's Trademarks. [Exhibit 1 and 2]
10. That Plaintiff is awarded actual damages in an amount proven at trial or minimum of \$ 20 Million.
11. That Defendants disgorge all profits derived from their wrongful conduct;
12. Interest at the maximum legal rate;
13. All reasonable attorney's fees and costs incurred herein;
14. For treble damages according to proof at trial;
15. That the court grants such other, further, and different relief as the Court deems just and proper under the circumstances.

-----  
Anshu Bharat Pathak;  
Plaintiff  
In Pro Per

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial as provided by Rule 38 (a) of the Federal Rules of Civil Procedure.

-----  
Anshu Bharat Pathak; Plaintiff  
In Pro Per  
August 20, 2016



# EXHIBIT 1

**United States of America**  
United States Patent and Trademark Office

## EXOTIC MEAT MARKET

**Reg. No. 4,469,007**

**Registered Jan. 21, 2014**

**Int. Cl.: 35**

**SERVICE MARK**

**PRINCIPAL REGISTER**

PATHAK ANSHU BHARAT (UNITED STATES INDIVIDUAL)  
P O BOX 9192  
MORENO VALLEY, CA 92552

FOR: ON-LINE RETAIL GIFT SHOPS; ON-LINE RETAIL STORE SERVICES FEATURING EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; ON-LINE WHOLESALE STORE SERVICES FEATURING EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; OPERATING AN ON-LINE SHOPPING SITE IN THE FIELD OF EXOTIC MEATS, HOTDOGS, SAUSAGES, SALAMIS; RETAIL AND ON-LINE GROCERY STORE SERVICES FEATURING HOME DELIVERY SERVICE, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 12-10-1999; IN COMMERCE 12-10-1999

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "MEAT MARKET", APART FROM THE MARK AS SHOWN.

SEC. 2(F) AS TO "EXOTIC MEAT MARKET".

SER. NO. 85-813,808, FILED 1-2-2013.

INGA ERVIN, EXAMINING ATTORNEY



*Nichelle K. Lee*  
Deputy Director of the United States  
Patent and Trademark Office

# EXHIBIT 2

**United States of America**  
United States Patent and Trademark Office

## Exotic Hot Dog of the Month Club

**Reg. No. 4,453,666**

**Registered Dec. 24, 2013**

**Int. Cl.: 35**

**SERVICE MARK**

**PRINCIPAL REGISTER**

PATHAK ANSHU BHARAT (UNITED STATES INDIVIDUAL)  
25517  
LOS CABOS DRIVE  
MORENO VALLEY, CA 92551

FOR: COMPUTERIZED ON-LINE RETAIL STORE SERVICES IN THE FIELD OF MONTHLY  
EXOTIC HOT DOGS SHIPMENTS TO CLUB MEMBERS, IN CLASS 35 (U.S. CLS. 100, 101  
AND 102)

FIRST USE 12-10-1999; IN COMMERCE 12-10-1999.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PAR-  
TICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CLUB", APART FROM THE  
MARK AS SHOWN

SEC. 2(F).

SER. NO. 85-813,863, FILED 1-2-2013.

INGA ERVIN, EXAMINING ATTORNEY



*Deborah L. Cohen*

Commissioner for Trademarks of the  
United States Patent and Trademark Office

# EXHIBIT 3

From  
Anshu Pathak  
5615 S. Cameron St; Unit 7  
Las Vegas, NV 89118  
Email: [anshupathak@aol.com](mailto:anshupathak@aol.com)  
May 30, 2016

To,  
Lobel's of New York, LLC;  
Leon Lobel;  
Stanley Lobel;  
Evan Lobel;  
Mark Lobel;  
Stephen Fraum and  
Rose Fraum  
250 Mill Street  
Rochester, NY 14614

Sir,

I am proud of you as my competitor, but it has been observed and recorded that your business is making bids on my Trademark as "Keyword" through different search engines. My Trademark is being infringed by you and your business to sell your products through your on-line retail store known as "http://www.lobels.com".

I am Trademark owner for the word, "Exotic Meat Market". Trademark Registration Number 4469007. We are both competitors and we both offer same and similar products like to consumers through our on-line retail stores.

The mandatory fine for Trademark Infringement is \$ 50,000.00.

Please take this letter as my legal notice to stop infringing my Trademark.

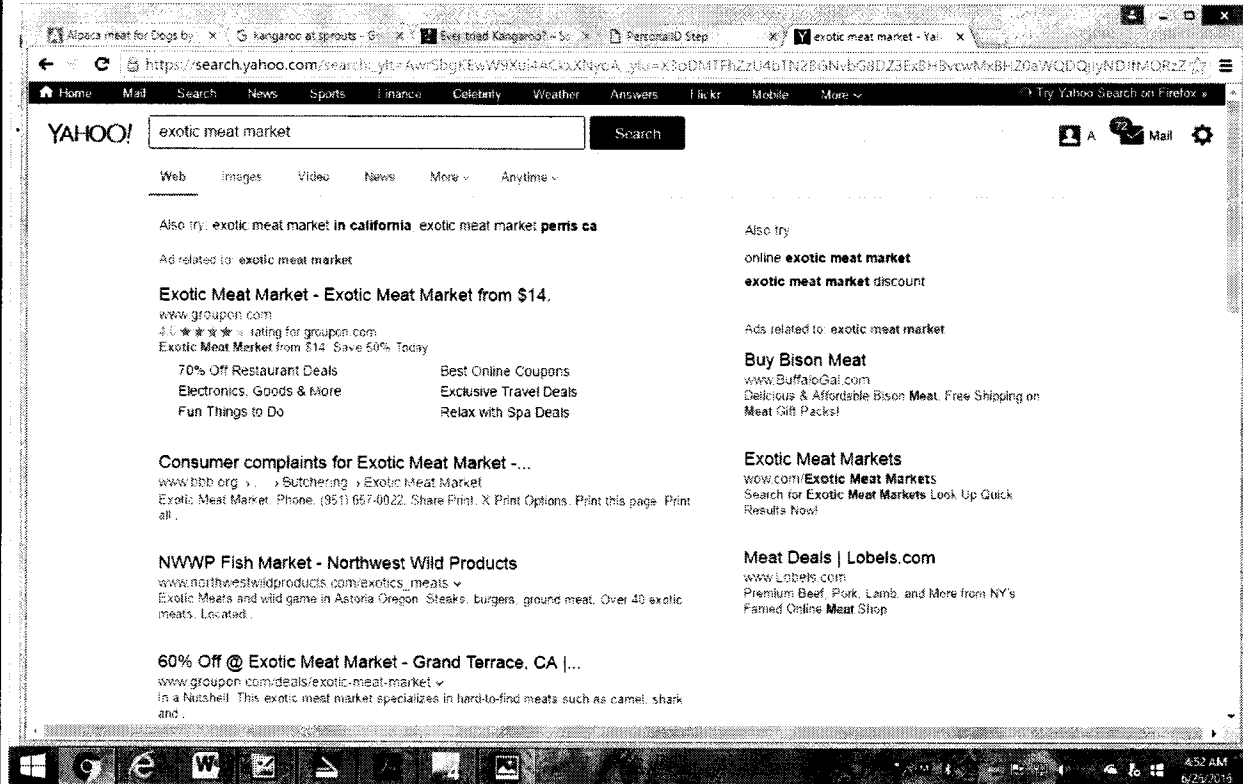
If I do not hear from you within 72 hours confirming in writing that you will not infringe my Trademark, I will file a legal action against your business in the Federal Court, Las Vegas, Nevada.

If you have any questions, please feel free to contact me.

Thank you

Anshu Pathak

Copy to related parties by electronic mail: Leon@lobels.com; Stanley@lobels.com;  
Evan@lobels.com; Mark@lobels.com; Stephen@lobels.com ; Rose@lobels.com ;



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**Exotic Meats, Exotic Meat Market, Exotic Meat ...**  
[yhs1-41759728056354.stores.yahoo.net/index.html](#)  
 Welcome to Anshu's Exotic Meat Market. Exotic Meat Market by Anshu Pathak created in 1969. Is the realization of a dream and a long journey. Traveling and cooking.

**The Exotic Meat Market - Made Man**  
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 Hamburgers are, really, quite boring. Hot dogs are so blasé. What you really want to get your hands on is a succulent, seared, lemon-pepper lion meat.

**Exotic Meat Market, Exotic Meats, Game Meats,...**  
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 Exotic Meat Market is a distributor of Exotic Meats, Exotic sausages, Exotic hot dogs and Exotic burgers made from legally harvested Lion Meat, Camel Meat, Kangaroo ...

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**Exotic Meat Market - YouTube**  
[www.youtube.com/watch?v=GFESA0knAQ](#)  
 Aug 09, 2012 Anshu Pathak runs an exotic meat and food distributing company based in Perris

**NWWP Fish Market - Northwest Wild Products**  
[www.northwestwildproducts.com/exotics\\_meats](#)  
 Exotic Meats and wild game in Astoria Oregon. Steaks, burgers, ground meat. Over 40 exotic meats. Located within a full service Seafood Market.

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 Exotic Meat Market Inc., Grand Terrace, California. 12,531 likes · 186 talking about this. Welcome to Exotic Meat Markets, the home of Exotic and Wild.

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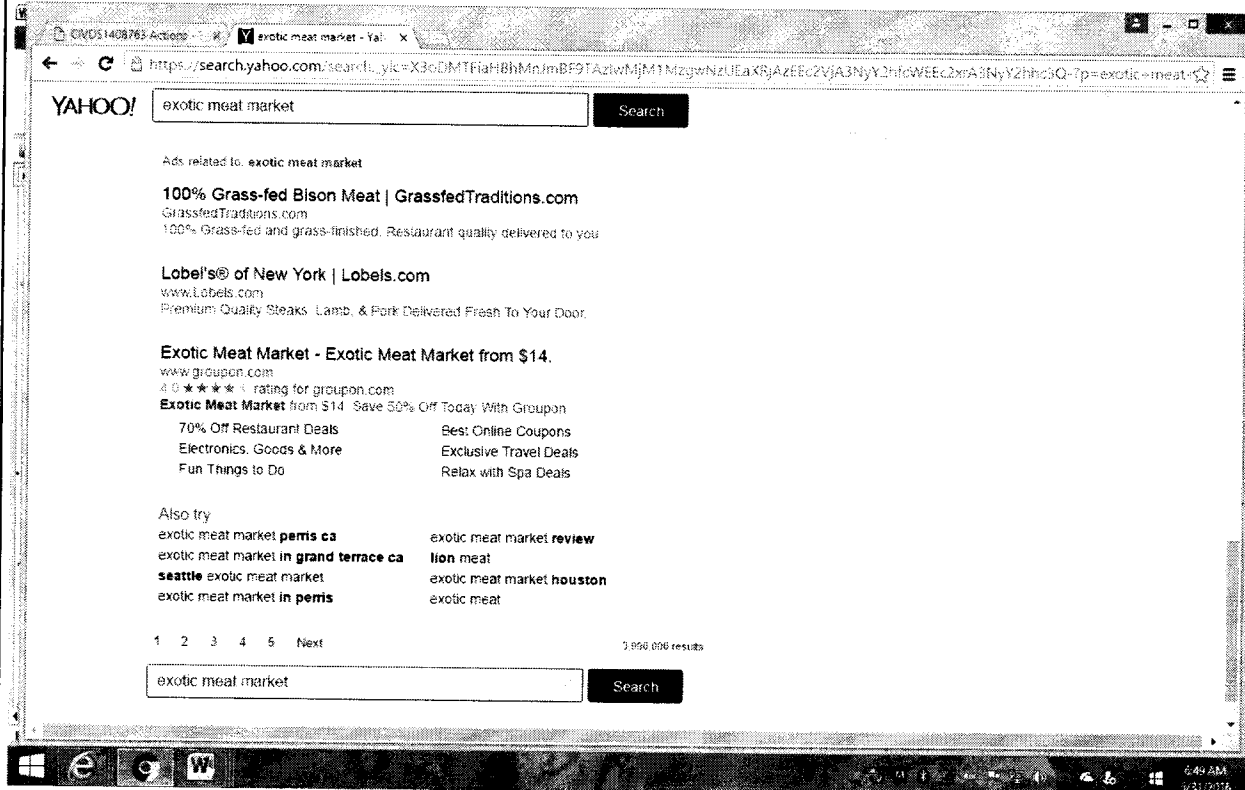
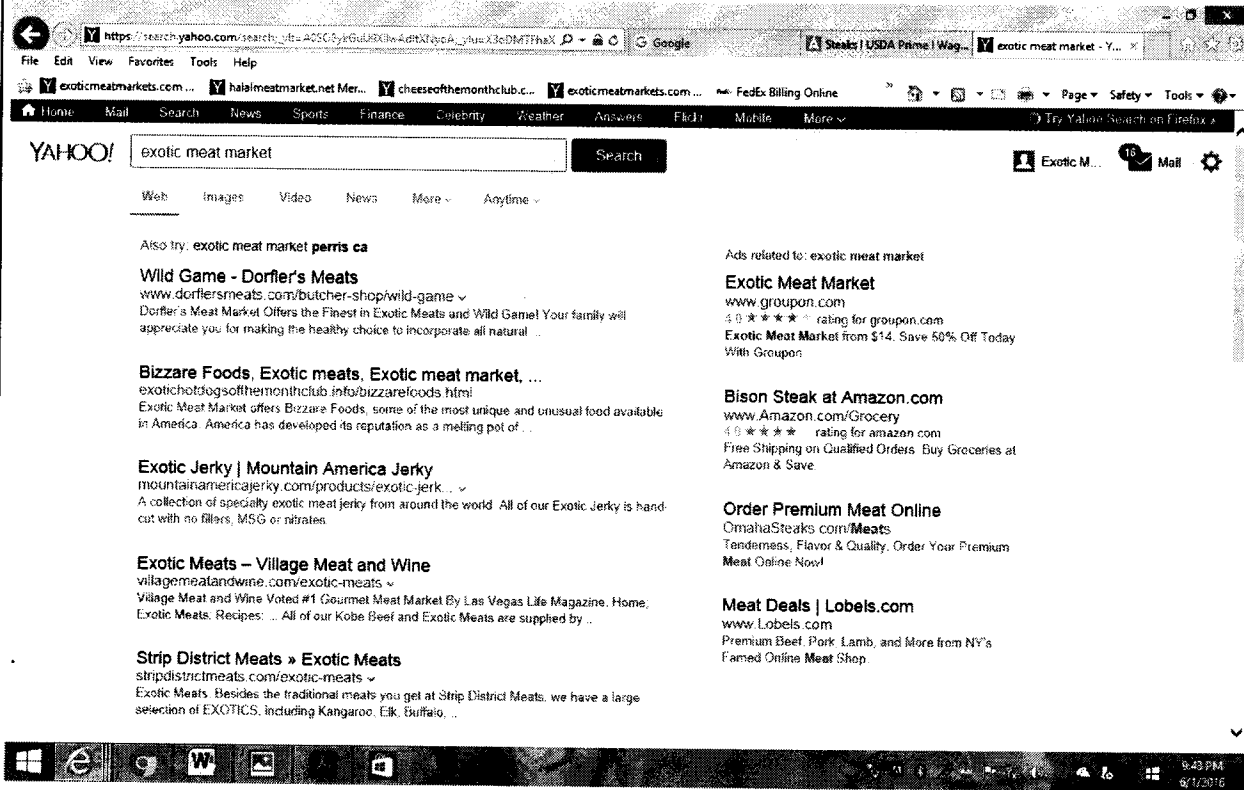
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Online shopping for purchase of Exotic Meats from a great selection of Gourmet food,  
organic farm raised heart healthy lean meats and are highly recommended for...  
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**Exotic Meat Market**  
Directions Website  
Address: 130 W Walnut Ave Ste A18, Perris, CA 92571  
Phone: (951) 345-4623  
Price: \$\$\$\$  
Open today 9:00 AM - 5:00 PM  
Reviews ★★★★★ Yelp (23)  
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Recent Favorable Critical  
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[www.Lobels.com](http://www.Lobels.com)  
Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door.  
USDA Prime Filet Mignon Lamb Chops, Roasts & More  
All-Natural Wagyu Beef USDA Prime Beef Burgers  
Grilling Packages Lobel's Authentic BBQ

**Buffalo Gal - Bison Meat - Affordable Grass Fed Bison Meat**  
[www.buffalogal.com](http://www.buffalogal.com)  
Affordable Grass Fed Bison Meat Free Shipping on Meat Gift Packs!  
Specials - Bison Burger - Free Shipping - Bison Steaks

Searches related to EXOTIC MEAT MARKET  
Exotic Meat Market California Exotic Meats for Sale  
Exotic Meat Market San Antonio Bear Meat for Sale  
Exotic Meat Market Houston Exotic Meats San Antonio  
Exotic Meat Market Denver Bear Jerky for Sale

Prev 1 2 3 4 5 6 7 8 9 10 Next

Aol Search. EXOTIC MEAT MARKET SEARCH

3:32 AM 9/30/2016

1 AOL Mail (1653) EXOTIC MEAT MARKET - A...

2 **Aol.** EXOTIC MEAT MARKET

3 Web Images Videos News More Tools SafeSearch

4 Page 2 of about 3,920,000 results

5 Ads related to EXOTIC MEAT MARKET

6 **Exotic Meat Market - Exotic Meat Market from \$14.**  
<http://www.groupon.com>  
**Exotic Meat Market** from \$14. Save 50% Today  
 50% Off Exotic Meat Market - Grand Terrace, CA | Groupon  
 groupon.com is rated **4.5 stars** (177 reviews)  
 70% Off Restaurant Deals Best Online Coupons  
 Electronics, Goods & More Exclusive Travel Deals  
 Fun Things to Do Relax with Spa Deals

7 **Lobel's® of New York | Lobels.com**  
[www.lobels.com](http://www.lobels.com)  
 Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door  
 USDA Prime Filet Mignon Lamb Chops, Roasts & More  
 All-Natural Wagyu Beef USDA Prime Beef Burgers  
 Grilling Packages Lobel's Authentic BBQ

8 **Buffalo Gal - Bison Meat - Affordable Grass Fed Bison Meat**  
[www.buffalogal.com](http://www.buffalogal.com)  
 Affordable Grass Fed Bison Meat. Free Shipping on Meat Gift Packs!  
 Specials - Bison Burger - Free Shipping - Bison Steaks

9 Web Results

10 **Exotic Meat Market Inc. - Facebook**  
[www.facebook.com/pages/Exotic-Meat-Market-Inc/156936877702974](http://www.facebook.com/pages/Exotic-Meat-Market-Inc/156936877702974)  
 Exotic Meat Market Inc. Grand Terrace, California 47,634 likes · 89 talking about this

11 8:30 AM 9/20/2016

13 AOL Mail (1653) EXOTIC MEAT MARKET - A...

14 **Aol.** EXOTIC MEAT MARKET

15 Web Images Videos News More Tools SafeSearch

16 Page 3 of about 3,920,000 results

17 Ads related to EXOTIC MEAT MARKET

18 **Exotic Meat Market - Exotic Meat Market from \$14.**  
<http://www.groupon.com>  
**Exotic Meat Market** from \$14. Save 50% Off Today With Groupon  
 50% Off Exotic Meat Market - Grand Terrace, CA | Groupon  
 groupon.com is rated **4.5 stars** (177 reviews)  
 70% Off Restaurant Deals Best Online Coupons  
 Electronics, Goods & More Exclusive Travel Deals  
 Fun Things to Do Relax with Spa Deals

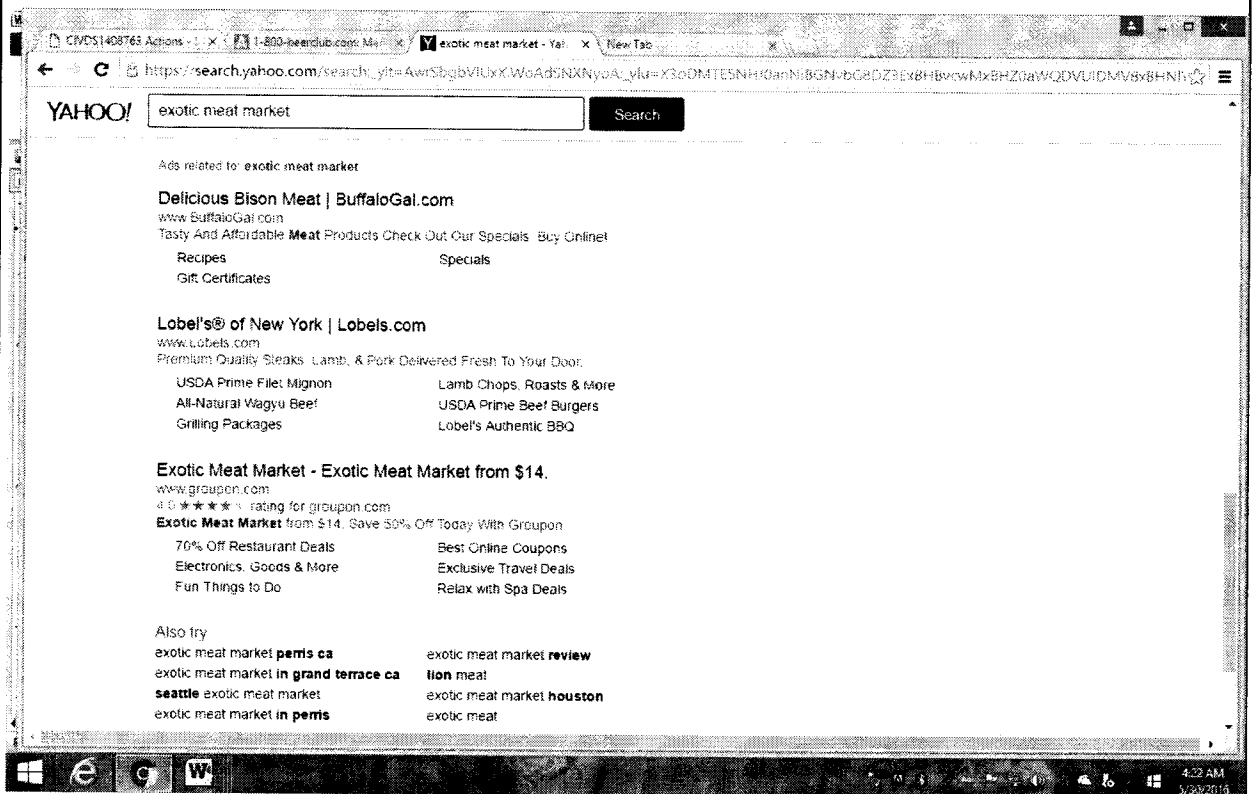
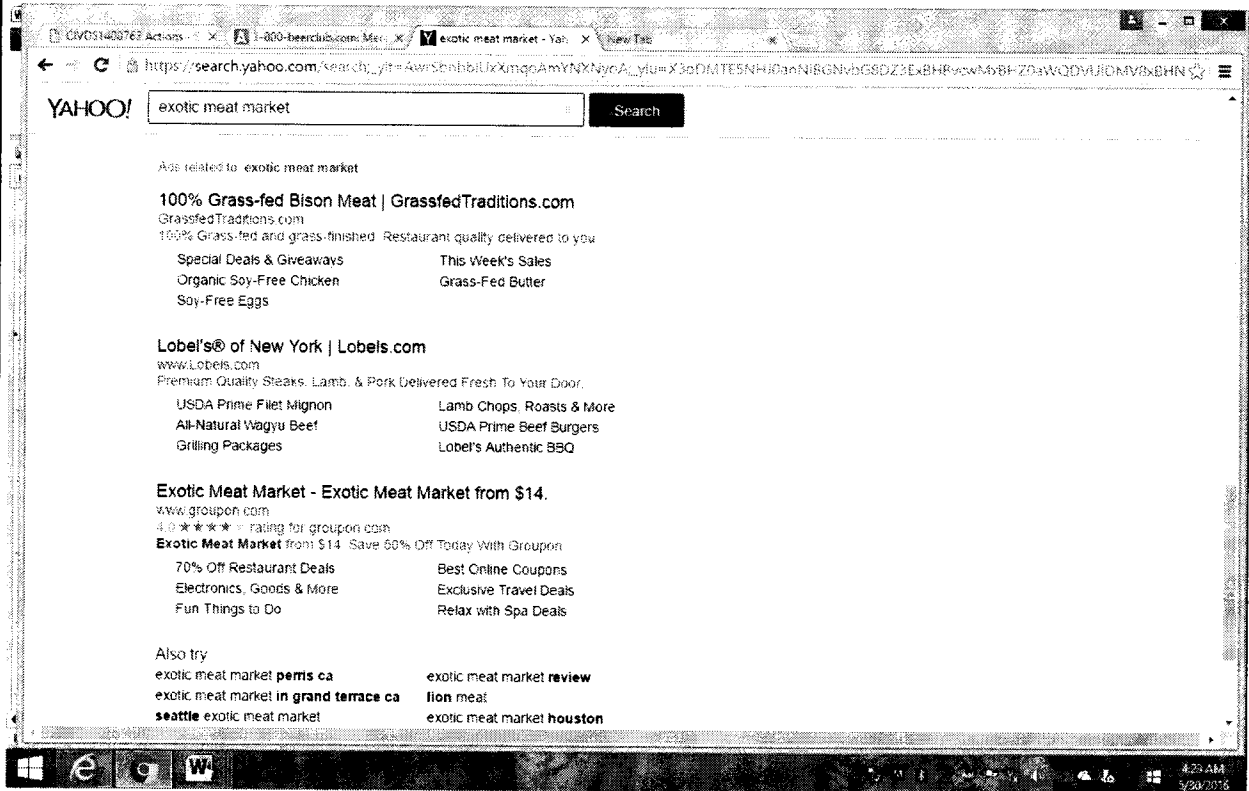
19 **Exotic Meat at Amazon.com**  
[www.amazon.com/Grocery](http://www.amazon.com/Grocery)  
 Buy Meat & Poultry and Save. Free Shipping on  
 Qualified Orders  
 amazon.com is rated **4.5 stars** (5,770 reviews)

20 **Vons Delivers Meats | Shop.safeway.com**  
[Shop.safeway.com/Vons](http://shop.safeway.com/Vons)  
 Buy Assorted Meat & Seafood Online Free Delivery on Your 1st Order!  
 Safeway - Groceries Online | Online Grocery Delivery  
 safeway.com is rated **4.5 stars** (10 reviews)  
 Delivery App Grocery Delivery FAQs  
 Online Savings Shop By History  
 Delivery Information

21 **Lobel's® of New York | Lobels.com**  
[www.lobels.com](http://www.lobels.com)  
 Premium Quality Steaks, Lamb, & Pork Delivered Fresh To Your Door  
 USDA Prime Filet Mignon Lamb Chops, Roasts & More - All-Natural Wagyu Beef

22 **Buffalo Gal - Bison Meat - Affordable Grass Fed Bison Meat**  
[www.buffalogal.com](http://www.buffalogal.com)

23 8:30 AM 9/20/2016



TSDR

ASSIGN Status

TTAB Status

( Use the "Back" button of the Internet

Browser to return to TESS)



**Word Mark** SINCE 1840 LOBEL'S OF NEW YORK

**Goods and Services** IC 029. US 046. G & S: Meats, namely, beef, lamb, veal, pork, ham and bacon; poultry; fish; hot dogs and sausages; cranberry sauce; olive oils; jams; marmalades. FIRST USE: 20001100. FIRST USE IN COMMERCE: 20001100

**Mark Drawing Code** (3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS

**Design Search Code** 26.03.01 - Ovals as carriers and single line borders

**Trademark Search Facility** NOTATION-SYMBOLS Notation Symbols such as Non-Latin characters, punctuation and mathematical signs, zodiac signs, prescription marks

**Classification Code** NUM-26-UP 1840 Other Numerals - 26 and Up  
SHAPES-COLORS-3-OR-MORE Design listing or lined for three or more colors  
SHAPES-MISC Miscellaneous shaped designs  
SHAPES-OVALS Oval figures or designs including incomplete ovals and one or more ovals

**Serial Number** 78801146

**Filing Date** January 27, 2006

**Current Basis** 1A

**Original Filing Basis** 1A

**Published for Opposition** January 8, 2008

**Registration Number** 3401796

**Registration Date** March 25, 2008

**Owner** (REGISTRANT) Lobel's of New York, LLC Leon Lobel, Stanley Lobel, Evan Lobel, Mark Lobel, Stephen Fraum, Rose Fraum (all U.S. citizens) LIMITED LIABILITY COMPANY DELAWARE 25 Pixley Industrial Parkway Rochester NEW YORK 14624

(LAST LISTED OWNER) LOBEL'S ENTERPRISES, LLC LIMITED LIABILITY COMPANY NEW YORK 46 BELLE FAIR ROAD RYE BROOK NEW YORK 10573

**Assignment Recorded** ASSIGNMENT RECORDED

**Attorney of Record** David K. Hou

**Disclaimer** NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "since 1840" and "New York" APART FROM THE MARK AS SHOWN

**Description of Mark** The color(s) red, black and white is/are claimed as a feature of the mark. "The mark consists of A red oval outlined in black, with the word "Lobel's" in white script lettering outlined in black in the middle of the oval, with the words and numerals "SINCE 1840" in white capital letters outlined in black above "Lobel's" in the oval, and the words "OF NEW YORK" in white capital

letters outlined in black underneath "Lobel's" in the oval."

<b>Type of Mark</b>	TRADEMARK
<b>Register</b>	PRINCIPAL
<b>Affidavit Text</b>	SECT 15. SECT 8 (6-YR).
<b>Live/Dead Indicator</b>	LIVE



## EXHIBIT 4

-----Original Message-----

From: Jim Denlea <jdenlea@denleacarton.com>

To: 'anshupathak@aol.com' <anshupathak@aol.com>; (david@lobels.com) <david@lobels.com>;  
'Leon@lobels.com' <Leon@lobels.com>; 'stanley@lobels.com' <stanley@lobels.com>;  
'evan@Lobels.com' <evan@Lobels.com>; 'mark@lobels.com' <mark@lobels.com>;  
'Stephen@lobels.com' <Stephen@lobels.com>; 'Rose@lobels.com' <Rose@lobels.com>

Sent: Wed, Jun 1, 2016 1:25 pm

Subject: FW: Lobels

Mr. Pathak,

We are General Counsel for Lobels of New York (LONY). Your email of May 30, 2016 has been forwarded to my attention for response. Initially, please be advised that LONY has not used your mark, and has no intention of using your mark. As LONY's multi-generational family history in the meat industry reflects, the LONY tradition is steeped in providing only the finest and freshest USDA prime beef, all-natural lamb, Waygu beef, Berkshire pork, and all-natural poultry. LONY has never specialized in "exotic meats," and nowhere in LONY's on-line butcher shop is there any reference of any kind to such "exotic" offerings. While that alone should suffice to respond to your unfounded allegation, LONY has taken the additional, affirmative steps of ensuring that (i) the word phrase "exotic meat market" is not used as a keyword in any of its search terms (and instructed its marketing partners as to the same), and (ii) identified the phrase as a "negative" that will not respond to any of LONY's more general search terms. In light of the same, any contemplated action by you would amount to a frivolous prosecution, the response to which will require us to seek all appropriate sanctions, including attorney's fees. Please govern your actions accordingly.

Very truly yours,  
James Denlea

James R. Denlea, Esq.  
Denlea & Carton LLP  
2 Westchester Park Drive-Suite 410  
White Plains, NY 10604  
(914) 331-0100  
[jdenlea@denleacarton.com](mailto:jdenlea@denleacarton.com)

**EXHIBIT 5**

**From:** Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>  
**To:** anshupathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>  
**Sent:** Sun, May 29, 2016 4:21 pm  
**Subject:** Possible Trademark infringement

**Anshu Pathak**  
**5615 S. Cameron St; Unit 7**  
**Las Vegas, NV 89118**  
**Email:** [anshupathak@aol.com](mailto:anshupathak@aol.com)  
**May 29, 2016**

**I am in receipt of your assertion of trademark infringement regarding federal trademarks for Exotic Meat Market. I have reviewed your two current live trademarks for Exotic Meat Market and find them to be in order.**

**After a brief search of my current keyword programs, I can find no advertising, nor solicitations for the term "Exotic Meat Market" in any of my current keyword programs. Please cite specific examples of the possible infringement.**

**In good faith, since I too am a trademark holder and pending a fair resolution of this issue, I have suspended a portion of my keyword program to limit any possible infringement.**

**However, as we continue to review our legal and advertising status, we will need to know some of the specific examples for which you are claiming infringement.**

**Thank you for your attention.**

**Rich Forrest**  
**Mountain Velvet Ltd.**  
**DBA Grande Natural Meats**

201. Plaintiff received following e-mail from a competitor/advertiser on May 30, 2016.

**From:** Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>  
**Date:** 5/30/16 9:46 AM (GMT-08:00)  
**To:** Anshu Pathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>  
**Subject:** Re: Possible Trademark infringement

**Greetings Anshu:**

**Thank you for the screen shots. It would seem Yahoo (aka Bing) is creating this problem. Exotic Meat Market WAS NOT one of my keywords for my rabbit advertising, yet the search engine decided that somehow my ad was suitable for that kind of search.**

1 As such, I will apologize for Yahoo's mistakes in their aggressiveness to sell ad space.

2 In an effort to fix the problem, I have added a negative keyword phrase "Exotic Meat  
3 Market" to all Yahoo (Bing) keyword campaigns.

4 Please let me know if any other searches result in unintentional infringement of Exotic  
5 Meat Market.

6 Thank you for your patience.

7 Rich  
8 Grande Meats

9 202. Plaintiff received following e-mail from a competitor on May 31, 2016.

10 From: Rich <antler333@gmail.com>

11 To: Anshu Pathak <anshupathak@aol.com>

12 Sent: Tue, May 31, 2016 7:48 am

13 Subject: Re: Trademark infringement - ElkUSA

14 Anshu:

15 Thank you for your attention in solving this problem. All my current ad programs have  
16 been covered by negative key words.

17 Please know that no intentional infringement occurred, but the pay per click search  
18 mechanisms seem to get to too aggressive sometimes. As such, should you find another  
19 possible infringement on Exotic Meat Market, just let me know and I can figure out a block  
20 on that particular search engine when it goes beyond my actual keywords.

21 I noticed that today grassfedtraditions replaced me and yesterday it was buffalogal. Seems  
22 that the Bing PPC (Yahoo and MSN) likes to "fluff up" its advertiser listings. Perhaps  
23 they need a letter.

24 rich  
25 grande meats.

On Tue, May 31, 2016 at 7:14 AM, <anshupathak@aol.com> wrote:

Good Morning Rich,

Thank you.

Have you checked your invoices from last three years for your key words? That will help  
you to understand the infringement of my Trademark.

At this point, I will not file a civil action against your business. But in future, if I will notice  
further infringement, I will be forced to file the civil action to protect my Trademark  
rights.

1 **You have been a Gentleman.**

2 **Best**

3 **Anshu Pathak**

4 **-----Original Message-----**

5 **From: Rich <[antler333@gmail.com](mailto:antler333@gmail.com)>**

6 **To: anshupathak <[anshupathak@aol.com](mailto:anshupathak@aol.com)>**

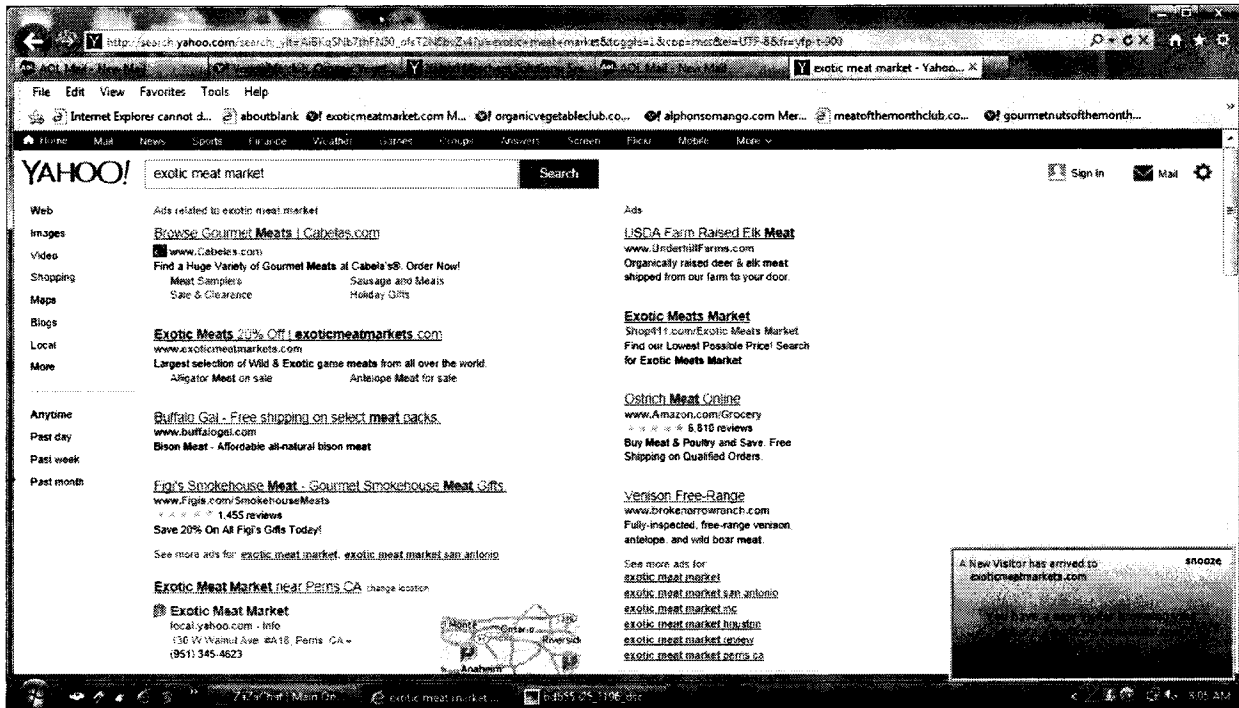
7 **Sent: Tue, May 31, 2016 5:19 am**

8 **Subject: Re: Possible Trademark infringement**

9 **I have added the negative key word "Exotic Meat Market" to all my pay per click**  
10 **advertising programs. That should cure any more problems.**

11 **Rich**

12 **grande meats**

**EXHIBIT 6**

**EXHIBIT 7**

-----Original Message-----

From: Chris Hughes <[chris@brokenarrowranch.com](mailto:chris@brokenarrowranch.com)>To: Anshupathak <[Anshupathak@aol.com](mailto:Anshupathak@aol.com)>Cc: chris <[chris@brokenarrowranch.com](mailto:chris@brokenarrowranch.com)>

Sent: Mon, Dec 16, 2013 12:58 pm

Subject: FW: Transcript of your chat

Anshu – See below verification from Yahoo/Bing that my account is not bidding on the keyword “exotic meat market.”

Regards,

Chris Hughes,

Broken Arrow Ranch,

Owner, 830-367-5875

[www.brokenarrowranch.com](http://www.brokenarrowranch.com)From: Microsoft [<mailto:trnsrpt@microsoft.com>]

Sent: Monday, December 16, 2013 2:51 PM

To: Chris

Subject: Transcript of your chat

**General Info**

Chat start time	Dec 16, 2013 3:30:19 PM EST
Chat end time	Dec 16, 2013 3:50:39 PM EST
Duration (actual chatting time)	00:20:20
Operator	John

**Chat Transcript**

info: Welcome to Bing Search Advertising live chat, an Ad Specialist will be with you shortly. You are currently '2' in the queue. Current average wait time is 0 minutes, and 31 seconds. Thanks for your patience.

info: Privacy Statement

You are now chatting with 'John'.

John: Hi! This is John with Bing Ads. How may I help you today?

Chris: I need your help to resolve a trademark infringement dispute. Can you please verify the my account is not bidding on the keyword "exotic meat market." My account number is: X0515327. Thanks

John: I understand how you feel, if it happened to me I'd feel the same way. But don't worry Chris, since you have me now, I'll do everything I can to resolve your concern. Okay?

John: Is this the first time you experience this issue? Do you have any existing ticket number?

Chris: First time. No ticket number. I just need a notification from Bing/Yahoo to verify/prove that I am not bidding on the keyword "exotic meat market."

John: I understand. Let me review first your account and see what I can do to answer all of your question. Please stay on chat for about 2 - 3 minutes.

Chris: Thanks



1 John: Thank you for waiting. Can I have your best call back number just in case the chat gets disconnected we can make a follow up?  
Chris: 830-367-5875  
2 John: Before we go further, I may need to verify the account for security purposes. Can you please provide the last four digits of your credit  
card on file? and also the account holders name?  
3 Chris: CC = 2001. Chris Hughes  
John: Thank you for verifying the account. I can see here that there is no keyword "Excotic Meat Market" on your account.  
4 Chris: Thank you. That's all I need. Is it possible to have this chat string emailed to me?  
John: You can have a copy of this chat transcript by looking on the the envelope icon on the upper left hand side.  
5 Chris: Thanks. Just to clarify.... it looks like there was a typo on your response. I was verifying that "exotic meat market" was not a targeted  
keyword. Please confirm that was the keyword your searched.  
John: You have only four keywords on your campaign name "Unassigned Campaign".  
John: Venison, Wild game meat, Venison and Wild game meat.  
6 John: Chris, are you still with me?  
Chris: Right. And "exotic meat market" is not one of them, correct? Your response was "excotic (misspelled) meat market."  
7 Chris: I just need to be able to clearly demonstrate that "exotic meat market" is not being used and the typo may confuse things.  
John: Sorry for the typo error that I send to you. Yes, you are correct, I can confirm to you that there is no keyword exotic meat market on your  
account.  
8 Chris: Perfect. That's all I need. Thank you and have a great day.  
John: Your very much welcome. I've created a ticket for this specific issue or concern and this will remain open and accessible when you call  
us back or until we fully resolve this matter.  
9 John: Your reference number is 1227463292.  
John: Is there anything else I may assist you with right now?  
Chris: Thanks. Logging off.  
10 John: It is a pleasure assisting you. Thank you for contacting Bing Ads. Have a great day!  
info: Your chat transcript will be sent to [chris@brokenarrowranch.com](mailto:chris@brokenarrowranch.com) at the end of your chat.  
John: I will now be closing this ticket number and it will remain open if you call us back or we didn't resolve your issue.  
John: Bye for now.